NEVADA COUNTY LOCAL AGENCY FORMATION COMMISSION

SPHERE OF INFLUENCE UPDATE - TRUCKEE DONNER PUBLIC UTILITY DISTRICT

FINAL ENVIRONMENTAL IMPACT REPORT

STATE CLEARINGHOUSE NO. 2012062081

Prepared for:

NEVADA COUNTY LOCAL AGENCY FORMATION COMMISSION
950 MAIDU AVENUE
NEVADA CITY, CA 95959

Prepared by:

PMC®

2729 PROSPECT PARK DRIVE, SUITE 220
RANCHO CORDOVA, CA 95670

JULY 2013

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ES.1 PURPOSE AND SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

The primary purpose of this Final EIR is to satisfy CEQA requirements by addressing the environmental effects specific to the proposed Sphere of Influence update for the Truckee Donner Public Utility District (referred to hereafter as the proposed project). The project proposes an update to the Truckee Donner Public Utility District (TDPUD; District) Sphere of Influence (SOI) implemented through one of two options. The first option is identified as the LAFCo-recommended SOI option, and the second is identified as the District-preferred SOI option.

ES.2 PROJECT CHARACTERISTICS

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 requires Nevada County LAFCo to update the SOI for all applicable jurisdictions in the county. A sphere of influence is defined by Government Code Section 56076 as "a plan for the probable physical boundary and service area of a local agency determined by the commission."

The proposed project involves the adoption of a SOI boundary by Nevada County LAFCo establishing the SOI boundaries for the Truckee Donner Public Utility District (TDPUD; District). The project evaluated in this EIR contains two potential SOI boundary areas for consideration by Nevada County LAFCo: the LAFCo-recommended SOI and the District-preferred SOI.

The LAFCo-recommended SOI is the same for both electrical service and water service. In general, the LAFCo-recommended SOI for electric service includes the TDPUD's current electric service area as well as developed areas within and adjacent to the Town of Truckee, including some lands in Placer County. The LAFCo-recommended SOI for water service includes lands within the Town of Truckee and adjacent to the town. The District-preferred SOI boundary proposes to maintain most of the area of the current TDPUD SOI for both water and electric services; however, it would expand the electrical sphere to include the Northstar Area and 25.5 square miles that includes Hobart Mills, Russell Valley, and north to the Stampede Reservoir Generation Facility. This area extends into Sierra County.

ES.3 PROJECT ALTERNATIVES SUMMARY

CEQA Guidelines Section 15126.6 requires that an environmental impact report describe a range of reasonable alternatives to the project which could feasibly attain the basic objectives of the project and reduce the degree of environmental impact. The Draft EIR provides a qualitative analysis of alternatives as compared to the proposed project. Alternatives identified for the proposed project include the following:

- **Alternative 1 – No Project Alternative**. CEQA Guidelines Section 15126.6(e)(1) requires that a No Project Alternative be analyzed. If the No Project Alternative were implemented, neither option of the proposed project (LAFCo-recommended Truckee Donner Public Utility District Sphere of Influence or District-preferred Sphere of Influence) would be implemented, and the existing Truckee Donner Public Utility District (TDPUD; District) Sphere of Influence (SOI) would be reduced to encompass only the area of the current TDPUD service area, i.e., areas actually employing TDPUD services for either electric or water service currently, as differentiated from other areas within the TDPUD Sphere of Influence that are not currently receiving either electric or water service from the District. This alternative was selected consistent with the requirements of CEQA Guidelines Section 15126.6(e).

- **Alternative 2 – Combined Sphere of Influence Area.** Under Alternative 2, the TDPUD Sphere of Influence for both electric and water service would include the addition of 3 square miles known as the Northstar area, adjacent to the TDPUD's current SOI boundary, the addition of a 25.5-square-mile area that includes Hobart Mills, Russell Valley, and north to the Stampede Reservoir Generation Facility, and the removal of 8 square miles of existing electric service and water service SOI area located to the east of the Glenshire Subdivision and Hirschdale.

- **Alternative 3 – Northstar Only.** Under Alternative 3, the District's SOI for both electric and water service would include the addition of 3 square miles known as the Northstar area, adjacent to the TDPUD's current Sphere of Influence boundary, and the removal of 8 square miles of existing electric service and water service SOI area located to the east of the Glenshire Subdivision and Hirschdale. The addition of a 25.5-square-mile area that includes Hobart Mills, Russell Valley, and north to the Stampede Reservoir Generation Facility into the District's SOI would not be included under this alternative.

- **Alternative 4 – Reduced Stampede Reservoir Area.** Under Alternative 4, the District's SOI for both electric and water service would include the addition of 3 square miles known as the Northstar area, adjacent to the TDPUD's current Sphere of Influence boundary, the removal of 8 square miles of existing electric service and water service SOI area located to the east of the Glenshire Subdivision and Hirschdale, and the addition of lands that include Hobart Mill and Russell Valley and north to the Nevada County/Sierra County line. The Reduced Stampede Reservoir Area Alternative would not include the addition of any lands in Sierra County.

ES.4 AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Nevada County LAFCo was identified as the lead agency for the proposed project. In accordance with Section 15082 of the CEQA Guidelines, Nevada County LAFCo prepared and distributed a Notice of Preparation (NOP) of an EIR on June 29, 2012. Written comments received in response to the NOP were considered in the preparation of the Draft EIR. The issues raised in the NOP response letters included SOI scenario preference and the need for state highway encroachment permits. Section 1.0, Introduction, of the Draft EIR provides a summary of issues and areas of concern related to the proposed project, as presented to Nevada County LAFCo by agencies and the public during the NOP review period. The complete text of the NOP and NOP comments were included as Appendix A to the Draft EIR.

ES.5 SUMMARY OF ENVIRONMENTAL IMPACTS

Table ES-1 presents a summary of project impacts and proposed mitigation measures that would avoid or minimize potential impacts. In the table, the level of significance of each environmental impact is indicated both before and after the application of the recommended mitigation measure(s).

For detailed discussions of all project impacts and mitigation measures, the reader is referred to the topical environmental analysis in Section 3.0 of the Draft EIR.

TABLE ES-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact		Level of Significance Without Mitigation	Mitigation Measure		Resulting Level of Significance
Land Use					
Impact 3.1.1	The LAFCo-recommended and TDPUD-preferred update of the Sphere of Influence for the TDPUD would not conflict with local agency land use policies or regulations. However, the TDPUD-preferred SOI update (electric and water) would conflict with Nevada County LAFCo policies related to the extent of the SOI boundaries. This impact is potentially significant for the TDPUD-preferred SOI update for both electric and water service.	LS (LAFCo-recommended only) PS (TDPUD-preferred SOI electric and water)	**MM 3.1.1**	Should Nevada County LAFCo wish to adopt the TDPUD-preferred Sphere of Influence for electric and water service, the sphere of influence plan shall include a policy that annexations will be approved only when water and/or electrical services are needed serve development consistent with the land use designation of the subject territory ~~indicates development potential that requires the support of water and/or electrical service~~. Current TDPUD District Code 5.53.010.2 states "No service shall be provided without prior annexation approval from the appropriate LAFCo".	LS
Impact 3.1.2	The proposed update of the Sphere of Influence for the TDPUD would not conflict with local agency land use policies or regulations. The proposed project would also not contribute to any consistency issues associated with applicable land use policies and regulations (except for the project-specific effect identified and addressed under Impact 3.1.1).	LCC	None required.		LCC
Climate Change and Greenhouse Gases					
Impact 3.2.1	The proposed project could result in a net increase in greenhouse gas emissions and could result in a significant impact on the environment.	CC	None available.		SU

S – Significant CC – Cumulatively Considerable LS – Less Than Significant SU – Significant and Unavoidable NI – No Impact
PS – Potentially Significant LCC – Less than Cumulatively Considerable CS – Cumulatively Significant SM – Significant but Mitigatable

Impact		Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
Impact 3.2.2	Implementation of the proposed project could result in a net increase in greenhouse gas emissions, yet would not conflict with the goals of AB 32, and thus would not result in a significant impact on the environment.	LCC	None required.	LCC
Secondary Environmental Effects of the Project				
Impact 3.3.1	The proposed update of the Spheres of Influence for the TDPUD would establish land areas eligible for future annexation into the District and the provision of water and electric service. The potential future annexation and service provision by the TDPUD set forth by the establishment of the new SOIs could induce growth or a concentration of population that may result in physical environmental impacts.	S	None available.	SU
Impact 3.3.2	The proposed project, along with all existing, approved, proposed, and reasonably foreseeable development in Nevada County, could induce growth or a concentration of population that may result in physical environmental impacts.	CC	None available.	SU

S – Significant CC – Cumulatively Considerable LS – Less Than Significant SU – Significant and Unavoidable NI – No Impact
PS – Potentially Significant LCC – Less than Cumulatively Considerable CS – Cumulatively Significant SM – Significant but Mitigatable

1.0 Introduction

This Final Environmental Impact Report (FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). The Nevada County Local Agency Formation Commission (LAFCo) is the lead agency for the environmental review of the proposed Sphere of Influence (SOI) Update for the Truckee Donner Public Utility District (TDPUD or District) (project) and has the principal responsibility for approving the project. This FEIR assesses the expected environmental impacts resulting from development of the project and responds to comments received on the Draft EIR.

1.1 BACKGROUND AND PURPOSE OF THE EIR

OVERVIEW OF CEQA REQUIREMENTS FOR PREPARATION OF AN EIR

Nevada County LAFCo, serving as the lead agency, has prepared this EIR to provide the public and responsible and trustee agencies with information about the potential environmental effects of the proposed project. As set forth in the provisions of CEQA and implementing regulations, public agencies are charged with the duty to consider the environmental impacts of proposed development and to minimize these impacts, where feasible, while carrying out an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

State CEQA Guidelines Section 15121(a) states that an EIR is an informational document for decision-makers and the general public which analyzes the significant environmental effects of a project, identifies possible ways to minimize significant effects, and describes reasonable alternatives to the project that could reduce or avoid its adverse environmental impacts. Public agencies with discretionary authority are required to consider the information in the EIR, along with any other relevant information, in making decisions on the project.

CEQA requires the preparation of an environmental impact report prior to approving any project that may have a significant effect on the environment. For the purposes of CEQA, the term "project" refers to the whole of an action which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (State CEQA Guidelines Section 15378[a]). With respect to the Sphere of Influence (SOI) Update for the TDPUD, Nevada County LAFCo has determined that the proposed improvement is a "project" within the definition of CEQA.

BACKGROUND OF ENVIRONMENTAL REVIEW PROCESS OF THE PROJECT

The following is an overview of the environmental review process for the project that has led to the preparation of this FEIR.

Notice of Preparation and Initial Study

In accordance with Section 15082 of the CEQA Guidelines, Nevada County LAFCo prepared a Notice of Preparation (NOP) of an EIR for the project on June 29, 2012. The NOP was circulated to the public, local, state, and federal agencies, and other interested parties to solicit comments on the proposed project. The 30-day comment period closed on July 30, 2012.

Draft EIR

The Draft EIR was released for public and agency review on February 6, 2013, and the comment period closed on March 25, 2013. Written comments on the Draft EIR and public testimony at the meeting held March 21, 2013, were solicited and received on the Draft EIR.

Final EIR

Following the close of the public review period, Nevada County LAFCo received five individual comment letters from agencies, interest groups, and the public regarding the Draft EIR. This document responds to the written comments received as required by CEQA. This document also contains minor edits to the Draft EIR, which are included in Section 3.0, Errata. This document constitutes the FEIR.

Certification of the EIR/Project Consideration

The comments and responses that make up the Final EIR, in conjunction with the Draft EIR, as amended by the text changes, constitute the EIR that will be considered for certification by Nevada County LAFCo. If Nevada County LAFCo finds that the EIR is "adequate and complete," it may certify the EIR. The rule of adequacy generally holds that the EIR can be certified if it: (1) shows a good faith effort at full disclosure of environmental information; and (2) provides sufficient analysis to allow decisions to be made regarding the project in contemplation of its environmental consequences.

Upon review and consideration of the EIR, Nevada County LAFCo may take action to approve, revise, or reject the project. A decision to approve the project would be accompanied by written findings in accordance with State CEQA Guidelines Section 15091 and Section 15093. Public Resources Code Section 21081.6 also requires lead agencies to adopt a mitigation monitoring and reporting program to describe measures that have been adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.

1.2 ORGANIZATION AND SCOPE OF THE FINAL EIR

ES – EXECUTIVE SUMMARY

Summarizes the characteristics of the proposed project and provides a concise summary matrix of the project's environmental impacts and associated mitigation measures.

SECTION 1.0 – INTRODUCTION

Section 1.0 provides an overview of the EIR process to date and what the FEIR is required to contain.

SECTION 2.0 – COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

Section 2.0 provides a list of commenters, copies of written comments (coded for reference), and the responses to those written comments made on the Draft EIR.

SECTION 3.0 – ERRATA

Section 3.0 consists of revisions to the Draft EIR that are a result of responses to comments, as well as minor staff edits that do not change the intent or content of the analysis or mitigation measures.

APPENDICES

This section also includes the revisions to Draft EIR Section 3.2, Climate Change and Greenhouse Gases.

2.0 Comments and Responses to Comments on the Draft EIR

2.1 INTRODUCTION

No new significant environmental impacts or issues, beyond those already covered in the Draft EIR for the proposed Sphere of Influence Update for the Truckee Donner Public Utility District, were raised during the comment period on the Draft EIR. Nevada County LAFCo, acting as the lead agency, evaluated and responded to comments on the Draft EIR. Comments received during the comment period do not involve any new significant impacts or "significant new information" that would require recirculation of the Draft EIR pursuant to State CEQA Guidelines Section 15088.5.

2.2 LIST OF COMMENTERS

The following individuals and representatives of organizations and agencies submitted written comments on the Draft EIR:

Letter	Individual or Signatory	Affiliation	Date
A	Tina Bartlett, Regional Manager	California Department of Fish and Wildlife	2/28/13
B	Kristina Berry, Executive Officer	Placer County Local Agency Formation Commission	3/21/13
C	Michael Smart, President	Liberty Utilities (California Pacific Energy Company, LLC)	3/25/13
D	None Listed	Truckee Donner Public Utility District	Not dated
E	Mike Staudenmayer, General Manager	Northstar Community Service District	3/07/13
MTG	Multiple	March 21, 2013 LAFCo Meeting	3/21/13

In addition to written comments, verbal comments on the Draft EIR were received at LAFCo meeting held March 21, 2013. A summary of these comments and responses thereto are also provided.

2.3 COMMENTS AND RESPONSES

2.3.1 REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

State CEQA Guidelines Section 15088 requires that lead agencies evaluate all comments on environmental issues received on the Draft EIR and prepare a written response. The written response must address the significant environmental issue raised and must provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies need only to respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (State CEQA Guidelines Section 15204).

State CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. State CEQA Guidelines Section15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to State CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

State CEQA Guidelines Section 15088 recommends that where response to comments results in revisions to the Draft EIR, those revisions be noted as a revision to the Draft EIR or in a separate section of the Final EIR. As a result of the comment letters received, revisions have been made to the text of the Draft EIR. Readers are directed to Section 3.0, Errata, of this Final EIR for details concerning the resultant changes. Readers are also directed to **Appendix A**, which is a revised Draft EIR Section 3.2, Climate Change and Greenhouse Gases, that completely replaces the original analysis in the Draft EIR. As previously stated, the revised analysis does not result in any new significant environmental impacts and does not alter the conclusions of the environmental analysis provided in the Draft EIR.

2.3.2 RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. Where changes to the Draft EIR text result from responding to comments, those changes are included in the response and demarcated with revision marks (<u>underline</u> for new text, ~~strikeout~~ for deleted text). However, as previously stated, the revised Draft EIR Section 3.2, Climate Change and Greenhouse Gases, identified as **Appendix A** is considered to completely replace the original analysis in the Draft EIR, which is presented as **Appendix B** for comparison purposes. The majority of revisions occurred under subsection 3.2.3, Impacts and Mitigation Measures, of Section 3.2.

2.4 MASTER RESPONSE – REVISED DRAFT EIR SECTION 3.2, CLIMATE CHANGE AND GREENHOUSE GASES

A number of comments (see Letters C and D) focused on the selection of data used to complete the analysis in Draft EIR Section 3.2, Climate Change and Greenhouse Gases. For emission modeling purposes, Draft EIR Section 3.2 relied on sources of data including the emission intensity factors of the electric service provider, Sierra Pacific Resources, for an analysis of Liberty Utilities California Pacific Energy Company (CalPeco) and on statewide average emission intensity factors for an analysis of the Truckee Donner Public Utility District (TDPUD). Section 3.2 also relied on information obtained from the California Public Utilities Commission, California Energy Commission, and CalPeco for energy consumption and renewable energy mix data. It is noted that several solicitations were made for energy consumption and renewable energy mix data from both CalPeco and the TDPUD prior to the preparation of the Draft EIR with the solicitations resulting in the receipt of data and information from CalPeco only. Where provider-specific data was not available or was not provided, the Draft EIR employed the best available information from public data sources at the time of preparation to evaluate climate change and greenhouse gas impacts. These sources of information are cited on Draft EIR pages 3.2-25 and -26.

Following the circulation of the Draft EIR, more specific greenhouse gas emission intensity factors for energy generation, energy consumption, and renewable energy mix were received from both CalPeco (correspondence dated April 16, 2013) and the TDPUD (correspondence dated April 11, 2013). As a result of the receipt of the revised data, PMC has employed the updated data to re-evaluate potential climate change and greenhouse gas impacts and has revised Draft EIR Section 3.2, Climate Change and Greenhouse Gases. The revised Draft EIR Section 3.2 is provided as **Appendix A** of this document and contains updated modeling for both CalPeco and the TDPUD. The revised Section 3.2, Climate Change and Greenhouse Gases, identified as **Appendix A** is considered to completely replace the original analysis in the Draft EIR, which is presented as **Appendix B** for comparison purposes. The majority of revisions occurred under subsection 3.2.3, Impacts and Mitigation Measures; however, subsection 3.2.2, Regulatory Framework, was also revised in order to reflect the most current climate change and greenhouse gas–related regulation, which has evolved since the circulation of the Draft EIR.

It is noted that the analysis in revised Section 3.2 (**Appendix A**) does not result in any new significant environmental impacts and does not alter the conclusions of the environmental analysis provided in the Draft EIR (**Appendix B**). For instance, the significance threshold for greenhouse gas contribution impacts (evaluated in Draft EIR Impact 3.2.1) is 4.6 metric tons of carbon dioxide equivalents (CO_2e) per service population. The original analysis (**Appendix B**) identified a CO_2e metric ton per service population ratio of 16.0 under the LAFCo-recommended SOI and 11.0 under the District-preferred SOI. The revised analysis (**Appendix A**) identifies a metric ton per service population ratio of 15.2 under the LAFCo-recommended SOI and 10.5 under the District-preferred SOI. Therefore, the cumulatively considerable and significant and unavoidable impact conclusion does not change. It is also noted, however, that the re-modeling effort described above and presented as **Appendix A** did result in a reduction in greenhouse gas emissions for both CalPeco and the TDPUD based on the use of the revised and refined input data from the respective service providers.

Similarly, the impact conclusion associated with Assembly Bill 32 compliance (Draft EIR Impact 3.2.2) is not altered in the revised Section 3.2. While the identified total energy consumption and renewable energy mix for both CalPeco and the TDPUD have been updated, the impact determination indicating no conflict with the goals of AB 32 would not change, as both CalPeco and the TDPUD are expected and required to achieve the mandated requirements of the Renewables Portfolio Standard program regardless of their respective SOIs due to California Public Utilities Commission and California Energy Commission regulations.

The complete revision of the climate change and greenhouse gases section of the DEIR (Section 3.2) raises the question whether the section should be recirculated to the public and agencies for additional comments pursuant to State CEQA Guidelines Section 15088.5. That section requires recirculation only under limited circumstances as follows:

> ***15088.5. Recirculation of an EIR Prior to Certification***
>
> *(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant'" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:*
>
> *(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
>
> *(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
>
> *(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.*

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish & Game Com. (1989) 214 Cal.App.3d 1043).

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

(c) If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.

(d) Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.

Here, the revised GHG section does contain a new analysis based on new information about the GHG generation projected for the TDPUD and CalPeco. However, applying the standards set forth in Section 15088.5(a) suggests that no recirculation would be required. The new analysis does not identify any new significant environmental impacts or any substantial increase in the severity of a previously identified impact. The new analysis indicates that the GHG impacts are likely to be less severe than previously analyzed. No mitigation measure proposed in the new analysis is considerably different from those previously analyzed. There is no information that the Draft EIR was so fundamentally and basically inadequate as to preclude meaningful public review and comment. Therefore this new GHG analysis falls within the scope of subsection (b) as new information which clarifies and amplifies an adequate EIR, which does not require recirculation.

That no recirculation is needed is further reinforced by the fact that the revised GHG analysis is the product of solicitation of input from the two concerned service providers.

Letter A

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EDMUND G. BROWN, Jr., Governor
CHARLTON H. BONHAM, Director

February 28, 2013

SR Jones, Executive Officer
Nevada County LAFCo
950 Maidu Court
Nevada, CA 95959

Subject: Truckee-Donner Public Utilities District –Sphere of Influence Update, Draft Environmental Impact Report (SCH# 2012062081), Nevada County

Dear SR Jones:

On February 7, 2013, the Department of Fish and Wildlife (CDFW) received a Draft Environmental Impact Report (DEIR) from Nevada County Local Agency Formation Commission regarding the Sphere of Influence Update for the Truckee-Donner Public Utilities District (Project). The CDFW appreciates the Lead Agency's willingness to accept comments on the Project.

A-1

As a trustee for California's fish and wildlife resources, the CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and their habitat. As a responsible agency, the CDFW administers the California Endangered Species Act (CESA), the Native Plant Protection Act, and other provisions of the Fish and Game Code (FGC) that conserve the State's fish and wildlife pubic trust resources.

The CDFW offers the following comments and recommendations on the proposed Project in our role as a trustee and responsible agency pursuant to the California Environmental Quality Act (CEQA), California Public Resource Code §21000 et seq.

The CDFW's primary concerns relate to the indirect impacts to biological resources from the Project. The comments provided herein are based on the information provided in the DEIR, the CDFW's knowledge of sensitive and declining vegetative communities and wildlife species in the area. Comments herein are limited to the likely biological resource impacts from the proposed Project.

A-2

Project Description
The purpose of the Project is to update the Sphere of Influence (SOI) for the Truckee-Donner Public Utilities District (TDPUD). The SOI area for TDPUD's electric and water services includes areas in the eastern portions of Sierra, Nevada and Placer counties, and the Town of Truckee in the Martis Valley area.

A-3

Indirect Impacts to Biological Resources
The DEIR does not adequately address indirect impacts that could occur due to the Project. Indirect impacts may occur through increased human/wildlife interactions, encroachment by

Conserving California's Wildlife Since 1870

Letter A Continued

exotic weeds and area-wide changes in surface water flows due to development of previously undeveloped areas. **A-3 cont.**

Increased Human/Wildlife Interactions
The proposed SOI would likely result in urban development of undeveloped areas, increasing the potential for human/wildlife interactions and exposure of species to the effects of urbanization, such as, higher volumes of vehicular traffic and pedestrians, increasing the amount and severity of indirect impacts to wildlife and habitat. Additionally, development of previously undeveloped land for residential uses can expose species to impacts from feral animals and unconfined pets. **A-4**

Encroachment by Exotic Weeds
Generally, landscaping installed as part of development has relied heavily on exotic, non-native plant species for decoration. Many non-native species will spread to natural areas, causing native plant life to be replaced by exotic species, resulting in indirect impacts to the habitat of listed species such as modification or degradation of habitat. **A-5**

Changes in Surface Water Flows
As development occurs, surface water flows normally increase due to an increase in impermeable surfaces through, for example, the placement of building materials and paving over permeable surfaces. In addition, surface water flows are modified due to changes in surface flow by point source stormwater infrastructure installed in order to handle greater flows from the increasing impermeable surfaces as well as from the introduction of drainage flows during seasons when waterways and wetland features are typically dry (commonly referred to as "summer nuisance flows"). Some cover types that contain habitat for listed species can be indirectly impacted by such changes. For example, seasonal wetland communities survive along a rigid set of soil, water and climatic conditions. Alteration of current inundation and desiccation regimes due to altered hydrology could substantially alter the characteristics of seasonal wetland habitat, resulting in loss or degradation of seasonal wetland habitat in developed and undeveloped areas of the proposed SOI. **A-6**

Conclusion
In conclusion, the CDFW finds that the DEIR should further discuss indirect impacts that could occur due to induced population growth. The CDFW staff is available to discuss our concerns, comments, and recommendations in greater detail. Please contact Tanya Sheya, Environmental Scientist at (916) 358-2953 or by email at Tanya.Sheya@wildlife.ca.gov. **A-7**

Sincerely

Tina Bartlett
Regional Manager

ec: Jeff Drongesen
Isabel Baer
Tanya Sheya
Department of Fish and Wildlife

State Clearinghouse

Letter A Tina Bartlett, Regional Manager, California Department of Fish and Wildlife

Response A-1: The commenter relates the mission of the California Department of Fish and Wildlife (CDFW). This comment is noted. It is understood that this comment is an introductory comment and further elaboration is forthcoming in subsequent comments.

Response A-2: The commenter notes that the CDFW's primary concerns relate to the indirect environmental effects of the project.

Section 3.3, Secondary Effects of the Project, of the Draft EIR addresses the environmental effects associated with anticipated actions and associated growth that may occur from establishment of the new SOI for the District. As stated on page 3.3-24 of the Draft EIR, the proposed project consists only of the establishment of a new SOI for the TDPUD as part of the mandated five-year Sphere of Influence review process for Nevada LAFCo, and no other actions (i.e., annexations, infrastructure extensions, or facility installations or improvements) are being sought at this time. However, the establishment of a new SOI, or the inclusion of new land areas within an SOI, is the first step in a series of actions that would need to occur to allow for the provision of services. Further, it is acknowledged in the Draft EIR that the inclusion of territory currently located in the Town of Truckee or in the unincorporated areas of Nevada, Placer, and Sierra counties within the TDPUD Sphere of Influence area could help to facilitate growth and development opportunities consistent with these agencies' general plans and any development approvals currently in place.

The Sierra County General Plan, Placer County General Plan, Martis Valley Community Plan, Town of Truckee General Plan, and Nevada County General Plan provide for land use development patterns and growth policies that allow for the orderly expansion of development to which the TDPUD would provide supporting services. The associated general plan EIRs and subsequent project EIRs have evaluated both the potential direct and indirect physical environmental effects of growth in the project area. As noted above, the proposed update to the SOI for the TDPUD would not result in the construction of any physical improvements or allow for the undertaking of any development not already permitted and contemplated by the general plans (and their associated EIRs) for the Town of Truckee or for Sierra, Placer, and/or Nevada counties.

Response A-3: The commenter states that the Draft EIR does not adequately address indirect impacts that could occur due to the project. These comments are responded to below and in Responses A-4 through A-6.

The Sierra County General Plan, Placer County General Plan, Martis Valley Community Plan, Town of Truckee General Plan, and Nevada County General Plan provide for land use development patterns and growth policies that allow for the orderly expansion of development to which TDPUD could provide supporting electric and water services in areas within the District's service area with the proposed SOI update. The associated general plan EIRs, subsequent project EIRs, or environmental studies evaluated the physical environmental effects of growth in the

project area. Section 3.3 of the Draft EIR provides a summary of the significant physical biological resource–related environmental impacts of general plan growth and subsequent development and infrastructure extension in the project area that the proposed new SOI would support. The discussion of the significant environmental impacts is based on technical analysis from the Sierra County General Plan, Placer County General Plan EIR, Martis Valley Community Plan EIR, Nevada County General Plan EIR, and Town of Truckee General Plan EIR.

As stated on page 3.3-40 of the Draft EIR, development and human occupation of the proposed SOI area would result in the loss of forest, herbaceous, shrub, and water (including wetland and riparian habitats) vegetation communities that may support special-status plant and wildlife species, as well as potentially obstruct wildlife movement. The Nevada County, Placer County, and Town of Truckee general plan EIRs identified these biological resource impacts as potentially significant (Nevada County 1995a, Chapter 3, Project Description–Biotic Resource; Truckee 2006, Chapter 4.3, Biological Resources; Placer County 2004a, pp. 2.0-59 through -78). Comments regarding changes in surface water flows are addressed in Response A-6.

Policy provisions and mitigation measures adopted by Sierra, Nevada, and Placer counties and the Town of Truckee to address biological resource impacts include subsequent project evaluation of site-specific impacts and implementation of avoidance or offset measures, prohibition against structures in wildlife movement corridors, and protection of and mitigation of impacts to impacted natural habitats. These mitigation measures and associated mitigating policy provisions include the following:

- Sierra County General Plan Land Use Element policy A; Water Resources Element policies 8 and 9
- Nevada County General Plan policies 1.17, 1.18, 13.1, 13.2, and 13.8 and mitigation measures 1, 14, 15, 16, 16A, and 17 through 21
- Town of Truckee General Plan Conservation and Open Space Element policies P2.1, P4.1 through P4.5, P5.1, and P5.3 and actions A2.1, A4.1, A5.1, and A5.2
- Placer County General Plan policies 6.A.1 through 6.A.12, 6.B.1 through 6.B.5, 6.C.1 through 6.C.14, 6.D.1 through 6.D.14, 6.E.1 through 6.E.5, and 7.E.1
- Martis Valley Community Plan policies 9.E.1 through 9.E.12, 9.F.1 through 9.F.7, 9.G.1 through 9.G.10, and associated implementation programs, and mitigation measures MM 4.9.3, MM 4.9.4, MM 4.9.5a and 4.9.5b, MM 4.9.6, MM 4.9.7, MM 4.9.8, and MM 4.9.11a and 4.9.11b

While biological resource impacts were identified as mitigated with policies under the Nevada County General Plan Final EIR, these impacts were identified as significant and unavoidable after mitigation for the Town of Truckee and Placer County. The Town of Truckee and Placer

County adopted statements of overriding considerations for their general plans based on social and economic benefits (e.g., improved housing opportunities, foster a rural quality of life, job generation, and economic benefits to the agency).

The indirect impacts identified by the commenter have been addressed in the Draft EIR as well as in the Sierra County General Plan EIR, Placer County General Plan EIR, Martis Valley Community Plan EIR, Nevada County General Plan EIR, and Town of Truckee General Plan EIR. The commenter provides no additional information identifying that these documents did not adequately address the physical environmental effects of growth on biological resources.

Response A-4: The commenter states that the project will result in urban development of undeveloped areas, increasing potential impacts to wildlife as a result of increased human/wildlife interaction.

The commenter is referred to Responses A-2 and A-3 outlining how this issue has been addressed in the DEIR and previous environmental documents. The proposed update to the SOI for the TDPUD would not result in the construction of any physical improvements or allow for the undertaking of any development not already planned for in the general plans (and analyzed in their associated EIRs) for the Town of Truckee or for Sierra, Placer, and/or Nevada counties.

Response A-5: The commenter states that typical landscaping employed by development uses invasive, exotic plant species that spread to natural areas and negatively impact native plant life and habitat.

The commenter is referred to Responses A-2 and A-3 outlining how this issue has been addressed in the DEIR and previous environmental documents. The proposed update to the SOI for the TDPUD would not result in the construction of any physical improvements or allow for the undertaking of any development not already permitted and contemplated by the general plans (and their associated EIRs) for the Town of Truckee or for Sierra, Placer, and/or Nevada counties.

Response A-6: The commenter states that development can affect surface water flows, resulting in unnatural water flows that negatively impact wetland habitat.

The commenter is referred to Responses A-2 and A-3. Also, as stated on pages 3.3-44 through -45 of the Draft EIR, policy provisions and mitigation measures adopted by Sierra, Nevada, and Placer counties and the Town of Truckee to address hydrologic impacts include utilization of best management practices (BMPs) for construction and design of development, implementation of ongoing surface water quality monitoring, setbacks from surface water features, use of containment features to avoid contamination of groundwater, and installation of drainage control facilities to mitigate increases in drainage flows. These mitigation measures and associated mitigating policy provisions include the following:

- Sierra County General Plan Land Use Element policy H; Water Resources Element policies 13 through 19, 21, and 22
- Nevada County General Plan policies 3.1, 3.2, 3.4, 3.5, 3.13, 3.15, 16.15, and 16.16 and mitigation measure 16
- Town of Truckee General Plan Land Use, Conservation and Open Space, and Safety elements policies P1.1, P1.3, P2.1, P2.3, P2.4, P4.2, P4.3, P11.1, P11.2, and P11.5 and actions A1.1 and A2.1
- Placer County General Plan policies 4.C.1, 4.C.11, 4.C.13, 4.E.1 through 4.E.18, 4.F.1 through 4.F.14, 6.A.1 through 6.A.12, and 6.B.1 through 6.B.5
- Martis Valley Community Plan policies 6.C.1, 6.C.4, 6.C.6, 6.D.1, 6.D.5 through 6.D.7, 6.E.2 through 6.E.11, 6.F.1 through 6.F.12, 9.D.1 through 9.D.10, 9.F.1, 9.F.2, 9.F.5, 5.E.1, 5.E.2, and associated implementation programs, and mitigation measures MM 4.7.1a through 4.7.1c, MM 4.7.2a through 4.7.2e, MM 4.7.3, and MM 4.7.5

Response A-7: The commenter states that the Draft EIR should further discuss indirect impacts potentially resulting from the project. The commenter is referred to Responses A-2, A-3, and A-6 outlining how this issue has been addressed in the DEIR and previous environmental documents.

Letter B

PLACER COUNTY
LOCAL AGENCY FORMATION COMMISSION
145 Fulweiler Ave, Ste 110, Auburn, California 95603 530-889-4097 lafco@placer.ca.gov

March 21, 2013

Ms. S.R. Jones
Executive Officer
Nevada LAFCO
950 Maidu Ave.
Nevada City, CA 95959-8617

RE: Truckee Donner Public Utility District
Draft Environmental Impact Report for SOI update

Dear Ms. Jones:

We have had the opportunity to review and comment on the Draft Environmental Impact Report for the Truckee Donner Public Utility District Sphere of Influence Update. **B-1**

The EIR appears to comprehensively address the impacts of the proposed Sphere of Influence for the District; including both the Nevada County LAFCO preferred sphere and the District preferred sphere.

The DEIR addresses the potential environmental impacts of the sphere proposals. Placer LAFCO will be commenting at a future date on the proposed Sphere of Influence proposal when it is proposed for consideration. **B-2**

Thank you for the opportunity to review and comment on this report. We would also like to take this time to thank the Commission for consideration of our concerns throughout this process. Although we are not considered the Principal County for purposes of determining the Sphere of Influence, decisions made by your Commission have the potential to directly impact future activity within Placer County. **B-3**

If you have any questions or need assistance, please feel free to contact me at (530) 889-4097.

Sincerely,

Kristina Berry, AICP
Executive Officer
Placer LAFCO

Letter B **Kristina Berry, Executive Officer, Placer County Local Agency Formation Commission**

Response B-1: The commenter notes that they believe that the Draft EIR comprehensively addressed the impacts of the proposed project. This comment is noted.

Response B-2: The commenter states that Placer LAFCo will be commenting at a future date when the specific sphere of influence option is considered. The comment is noted for Nevada County LAFCo's consideration.

Response B-3: The commenter states while Placer County is not the principal county for purposes of determining the TDPUD Sphere of Influence, the decisions made by Nevada County LAFCo have the potential to directly impact future activity in Placer County. The comment is noted for Nevada County LAFCo's consideration.

Letter-C

Liberty Utilities[SM]
California Pacific Electric Company

March 25, 2013

VIA U.S. MAIL AND ELECTRONIC MAIL

Nevada County Local Area Formation Commission
SR Jones, Executive Officer
950 Maidu Avenue
Nevada City, CA 95959-8617

RE: Comments on Draft Environmental Impact Report for the Truckee Donner Public Utilities District Sphere of Influence Update (SCH No. 2012012081)

Dear Ms. Jones:

Pursuant to the Notice of Availability issued by the Nevada County Local Agency Formation Commission ("LAFCo" or "Commission")[1], California Pacific Electric Company, LLC ("CalPeco")[2] submits these comments on the Draft Environmental Impact Report ("Draft EIR") for the Truckee Donner Public Utility District ("TDPUD" or "District") Sphere of Influence ("SOI") Update. As set forth in its prior communications to this Commission,[3] CalPeco supports the electric service SOI recommendation the Commission ("LAFCo-recommended SOI") set forth in the Preliminary Draft Sphere of Influence Plan Update for Truckee-Donner Public Utility District ("Draft SOI Plan Update"). CalPeco correspondingly opposes the requests by TDPUD ("District-preferred SOI") to include a 3-square-mile area in the Northstar community ("Northstar Area") and 25.5 square miles north of Truckee ("North of Truckee Area") within its electric SOI.[4] C-1

CalPeco appreciates the opportunity to comment on the Draft EIR and requests that these comments be included in the administrative record.[5] CalPeco further requests

[1] Notice of Availability, *Truckee Donner Public Utility District Sphere of Influence Update Draft Environmental Impact Report*, State Clearinghouse No. 20120602081, issued February 6, 2013.
[2] CalPeco also does business in California as "Liberty Utilities - California Pacific Electric Company." In the past, CalPeco has also done business in California as "Liberty Energy."
[3] CalPeco provided comments in a July 11, 2011 letter from Robert Dodds, its then President and General Manager, to Executive Officer Jones; an additional letter from Mr. Dodds to Executive Officer Jones, dated July 15, 2011; and an email to Executive Officer Jones from Michael R. Smart, President of CalPeco, dated July, 29, 2012.
[4] The North of Truckee Area includes Hobart Mills, Russell Valley, and north to the Stampede Reservoir Generation Facility. *See* Draft EIR, p. 2.0-9.
[5] CalPeco's comments on the Draft EIR will be limited to TDPUD's proposal to expand its electrical SOI; CalPeco has no comments on TDPUD's current or proposed water SOI.

Letter C Continued

that the final EIR include written responses to CalPeco's comments in the manner required by CEQA and its implementing guidelines.[6]

The Draft EIR defines the proposed project to consist of the update of TDPUD's SOI. The Draft EIR reviews two potential SOI boundary options: the LAFCo-recommended SOI and the District-preferred SOI. Both options establish separate electrical and water service sphere boundaries. The Draft EIR also evaluates four alternatives, including the No Project Alternative. **C-1 cont.**

As expressed in its prior submissions to the Commission, CalPeco supports the LAFCo-recommended SOI option. It appropriately excludes areas "that are not expected or anticipated to require" that TDPUD provide electric service.[7] In contrast, the District-preferred SOI seeks to expand TDPUD's electrical SOI to include the Northstar Area and the North of Truckee Area, each which has been and is currently within CalPeco's exclusive service area. Moreover CalPeco has the facilities in place to continue to provide reliable electric service to customers within both these areas. The Draft EIR supports the adoption of the LAFCo-recommended SOI option by appropriately concluding that the LAFCo-recommended SOI option is environmentally superior to the District-preferred SOI. **C-2**

CalPeco submits these comments in support of the Draft EIR's overall analysis of and proposed conclusions relating to the relative potential environmental impacts of the LAFCo-recommended SOI, the District-preferred SOI and four additional alternatives. The Draft EIR analyzes the potential impact on each of the following environmental issue areas: Aesthetics, Air Quality, Biological Resources, Climate Change and GHG emissions, Cultural and Paleontological Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use, Noise, Population/Employment/Housing, Public Services, Utilities, and Recreation, Transportation and Circulation. CalPeco concurs with the Draft EIR's conclusions that with respect to each of the above environmental issue areas,[8] the District-preferred SOI scenarios would result in greater impacts than the LAFCo-recommended SOI. **C-3**

In these comments, CalPeco proposes changes in the Draft EIR's comparison of the potential Greenhouse Gas ("GHG") Emissions to be expected from the LAFCo-recommended SOI and the District-preferred SOI. The changes CalPeco proposes request the use of the best available data which would more accurately set forth the **C-4**

[6] Pursuant to CEQA § 15088(a), the lead agency shall evaluate comments on the draft EIR that were received during the review period and must include written responses to comments in the final EIR. When a significant environmental issue is raised in comments that object to the draft EIR's analysis, the response must be detailed and must provide a reasoned, good faith analysis (*see* CEQA Regulations § 15088 (c)).
[7] Draft EIR, p. 2.0-5.
[8] With respect to the Climate Change and GHG emissions, the Draft EIR found that both the LAFCo-recommended SOI and the District-preferred SOI would exceed the BAAQMD threshold of 4.6 metric tons of CO_2e per service population.

Letter C Continued

relevant facts and better make the appropriate "apples-to-apples" comparison between the LAFCo-recommended SOI and the District-preferred SOI. In the event the Draft EIR cannot use this more specific data to reassess its GHG analysis, CalPeco requests that it explain why not, and set forth its reasons for why the data used in the Draft EIR is nonetheless adequate. CalPeco's comments will also identify several typographical-type mistakes which require correction.

C-4 cont.

Greenhouse Gas Emissions

Section 3.2 of the Draft EIR analyzes the potential GHG emissions impact of the LAFCo-recommended SOI and the District-preferred SOI. As part of this analysis, the Draft EIR purports to compare the GHG emissions for the areas TDPUD seeks to include in its SOI that are currently within CalPeco's service area (i.e., the Northstar Area and North of Truckee Area). However, the methodology the Draft EIR uses for this comparison does not include the best available data, is based on certain erroneous and/or unsupported assumptions, and requires modification.

The Draft EIR calculates expected GHG emissions for TDPUD and CalPeco by comparing the expected energy demand that would result from the maximum growth potential of the Northstar and North of Truckee areas and then multiplying this number by each utility's "emission intensity factor." The Draft EIR describes the emission intensity factor as a tool to measure the amount of GHG gases emitted per kilowatt-hour of electricity.[9]

C-5

The Draft EIR explains that it calculated TDPUD and CalPeco's relative GHG emissions using the California Emissions Estimator Model ("CalEEMod").[10] CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects.[11] The Draft EIR concludes that if CalPeco continues to provide electric service in the Northstar and North of Truckee Areas, just under 68,000 metric tons of CO_2e per year would be produced. The Draft EIR indicates that the CO_2e emission level would be just over 45,000 metric tons if TDPUD provided electric service instead.

This comparison mistakenly suggests that adoption of the District-preferred SOI could be environmentally-preferable to adoption of the LAFCo-recommended SOI in terms of GHG emissions. Several analytical and factual flaws permeate the discussion of GHG emissions and, therefore, the Draft EIR should be revised using more relevant, available and certified data. The comparison should to be based on the actual (or at least

[9] *See* Draft EIR, p. 3.2-21-22.
[10] *See* Draft EIR, p. 3.2-11.
[11] *See* http://www.caleemod.com/

Letter C Continued

accurate and reliable "proxies" for the actual level of emission intensity factors for TDPUD and CalPeco, respectively.

The fundamental and disqualifying flaw is that the Draft EIR's purported GHG emissions comparison does *not* actually compare the expected GHG emissions from either CalPeco or TDPUD. In a footnote to Tables 3.2-1- and 3.2-11, the Draft EIR discloses that the CalEEMod computer model has limited data and specifically does not include a utility-specific emission intensity factor for either TDPUD or CalPeco. Rather the Draft EIR uses the emission intensity factor for Sierra Pacific Resources as the "proxy" for CalPeco.[12] Sierra Pacific Power Company ("Sierra") provides electric service to the Northern portion of Nevada.

The Draft EIR similarly does not use an emission intensity factor specific to TDPUD; rather it relies on the *California statewide* emission intensity factor as the proxy for TDPUD.[13] Thus, although presented as a comparison between the TDPUD and CalPeco service areas, in actuality, the Draft EIR's GHG emissions analysis is simply a comparison between the emission intensity factor for Sierra's Northern Nevada service territory and the California statewide average.

C-5 cont'd

The Draft EIR conspicuously fails to explain the basis for use of the Northern Nevada and California statewide emission intensity factors as an appropriate proxy for CalPeco or TDPUD, respectively and, particularly with respect to TDPUD, there are no legitimate grounds for doing so. Other than the "geographic coincidence" that TDPUD is within the State of California, there is no demonstration of any correlation between the generation resources serving "Statewide California" and serving TDPUD's local loads. The Draft EIR does not report that TDPUD procures its power from within California; on the contrary, it explains that TDPUD is a "transmission-dependent utility," and the power is delivered to TDPUD "over NV Energy's transmission system,"[14] which strongly suggests that appreciable amounts of the power TDPUD provides its retail customers is generated in Nevada and states other than California.

Most importantly, use of a California statewide emission intensity factor understates the actual emissions associated with the power TDPUD procures to serve its customers. For example, in its RPS analysis,[15] the Draft EIR references TDPUD's Annual Power Content Label which discloses that TDPUD obtains 46% of its power

[12] *See* Draft EIR, p. 3.2-22, Table 3.2-10, fn. 2. The Draft EIR attributes the emission intensity factor to "Sierra Pacific Resources." We assume that this and other references are references to Sierra Pacific Power Company, which is the entity which provides utility electric service to Northern Nevada.
[13] *See* Draft EIR, p. 3.2-22, Table 3.2-11, fn. 2.
[14] Draft EIR, p. 2.0-1.
[15] *See* Draft EIR, p. 3.2-23 – 3.2-24.

Letter C Continued

from coal-fired power plants.[16] Coal has a much higher GHG emission intensity factor than other sources.[17] Yet for purposes of comparing the GHG emissions associated with TDPUD' service to the Northstar and North of Truckee Areas, the Draft EIR adopts the California statewide percentage of only 7% coal usage.

Therefore, use of the California statewide GHG emission intensity factor as a proxy for TDPUD understates the actual emissions that may appropriately be used to make any comparison relating to the environmental consequences of allowing TDPUD to expand its SOI. Accordingly, the Draft EIR should either use TDPUD's actual emission intensity factor in its calculation or use as a "proxy" a power source mix that matches the actual supply resources that TDPUD' uses to serve its customers.

If the CalEEMod computer model's limited functions can only accept the California statewide number when analyzing TDPUD's potential GHG emissions, the Draft EIR should manually adjust the computer model-generated final number to reflect how the analysis differs if it uses a more accurate data input point. As discussed below, that more accurate data point is TDPUD's actual data from that particular year, not the statewide proxy. If the Draft EIR cannot re-run the model with the more accurate number, it should state so and indicate that the statewide number which it uses as a proxy for TDPUD is more favorable to TDPUD than its actual number.

C-5 cont'd

Conversely, while CalPeco does obtain almost 100% of its power from Sierra, use of the Sierra system emission intensity factor overstates the actual amount of coal resources in CalPeco's supply portfolio, and thus, overstates the emission intensity factor. For example, Sierra purchases approximately 112 MW of coal-generated power from the Newmont Mining TS Power Plant in Eureka County, Nevada.[18] However, in light of the restrictions that SB 1368 has imposed on California investor-owned utilities such as CalPeco, from purchasing energy from new coal-fired generating facilities, no portion of the power that Sierra sells CalPeco is accounted for as having been generated at Newmont.[19] Thus, at the minimum, use of the Sierra system emission intensity factor overstates the CalPeco emission intensity factor by the amount of Newmont generation which Sierra generates for its customers within its Northern Nevada service territory.

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[16] The Annual Power Content Label is filed annually with the California Energy Commission. *See* CEC (California Energy Commission) 2012. "Utility Annual Power Content Labels for 2010." A copy is available at: http://www.energy.ca.gov/sb1305/labels/.

[17] "Compared to the average air emissions from coal-fired generation, natural gas produces half as much carbon dioxide, less than a third as much nitrogen oxides, and one percent as much sulfur oxides at the power plant." *See* http://www.epa.gov/cleanenergy/energy-and-you/affect/natural-gas.html

[18] *See* Attachment 1, Power Magazine, *TS Power Plant, Eureka County, Nevada*, October 15, 2008.

[19] *See Joint Application of Sierra Pacific Power Company and California Pacific Electric Company, LLC for the Transfer of Control and Additional Requests Relating to Proposed Transaction*, A.09-10-028, October 16, 2009, p. 53 (Under the Power Purchase Agreement between Sierra and CalPeco approved in D.10-10-017, CalPeco customers will receive their power from exactly the same generation resources they received through Sierra, which excludes Newmont Plant coal-fired power plant in compliance with the Commission's GHG Emissions Performance Standards in D.07-01-039.)

Letter C Continued

Furthermore, the Draft EIR does not identify the year that the Sierra system emission intensity factor was developed.[20] Presumably the data was not based on 2012 generation, but rather on generation from prior years. In 2012, Sierra reduced its consumption of coal and increased its reliance of natural gas fired generation. This change resulted from the substantial decrease in the cost of natural gas relative to coal experienced during 2012 in light of the substantial increase this nation has experienced in natural gas production.[21]

Accordingly, for purposes of using the Sierra emission intensity factor as the proxy for CalPeco's emission intensity factor, the Draft EIR should be revised to: **C-5 cont.**

a. Calculate an emission intensity factor for CalPeco at a level less than the Sierra system emission intensity factor to account for the fact that 112 MW of coal power Sierra includes in its supply portfolio is purposely excluded from the supply portfolio Sierra sells CalPeco;

b. To the extent it can use 2012 data, update the Sierra emission intensity factor to be used to account for the reduction in coal generation that Sierra experienced in 2012.

The Draft EIR's GHG emissions comparison also fails to take into account that the delivery of power to TDPUD and CalPeco are not the same. CalPeco obtains all its power from NV Energy and only one transmission path is involved. It is CalPeco's understanding that TDPUD obtains some portion of its power from the Northwest, Idaho and Utah and thus requires multiple transmission paths to have the power delivered to its service area. The Draft EIR fails to account for the environmental consequences that result from the power losses that result from longer transmission paths and the resulting increase in power generation necessary to serve the same level of retail electrical load. **C-6**

Also, the Draft EIR necessarily assumes that if TDPUD is authorized to serve the Northstar Area and the North of Truckee Area that it will be able to provide such service without the need to construct any additional facilities.[22] Given that TDPUD currently has no facilities to provide service to electric consumers in either the Northstar Area or the North of Truckee Area, any environmental assessment of adopting the District-preferred SOI should also assess that the requested expansion of service by TDPUD to these areas will in fact require the construction of new facilities. The Draft EIR should take into account the construction-related trucking, noise, biological resource disturbance, GHG **C-7**

[20] *See* Draft EIR, p. 3.2-11, stating that version 2011.1.1 was used for the GHG emissions calculation, therefore, the system's data would have been derived for 2011 or prior.
[21] *See* Attachment 2, Sierra Pacific d/b/a NV Energy Power Content Label for 2011 and 2012.
[22] *See e.g.*, Draft EIR, p. 3.2-21, fn.4. Footnote 4 appropriately explains that neither the LAFCo or TDPUD "has any land use regulatory authority," and thus no aspect of the current Project (i.e., the update to TDPUD's SOI) by itself "would specifically implement or directly result in the construction of any new facilities."

Letter C Continued

emissions and other substantial environmental impacts of TDPUD constructing the new facilities necessary for it to serve these loads. C-7 cont

Given that CalPeco is already reliably serving electric consumers in the Northstar Area and the North of Truckee Area with existing facilities, and continuation of CalPeco providing these customers such reliable service will not require the construction of new facilities, the Draft EIR should recognize the environmental benefits of the LAFCo-recommended SOI as it requires that no new facilities be constructed. CalPeco remains fit, willing and able to service these areas. C-8

RPS Generation

The Draft EIR appropriately concludes that both CalPeco and TDPUD "are expected to achieve the mandated requirements of the [California] Renewables Portfolio Standard program regardless of their respective [SOIs] due to CPUC and CEC oversight [respectively]."[23] It also appropriately describes the contractual arrangements by which CalPeco will satisfy the RPS requirements through 2015.

The Draft EIR adds that CalPeco has yet to contract for its RPS supply "for years beyond 2015."[24] While this statement is technically correct, it is also potentially misleading in suggesting that there may be some uncertainty regarding CalPeco's ability to enter contractual arrangements during this period to satisfy its RPS requirements. This sentence should accordingly be revised as set forth below to negate any possible negative inference regarding CalPeco's proven ability and corresponding commitment to execute the necessary commercial arrangements to satisfy the California RPS requirements for the years starting 2016: C-9

> While CalPeco has yet to execute any contracts relating to its procurement of RPS-eligible power for the years beyond 2015, CalPeco is actively exploring its options and has complete confidence that it will be able to timely enter the necessary commercial arrangements to satisfy its RPS requirements in 2016 and in the ensuing years.

Factual Errors

The Draft EIR contains certain factual errors. CalPeco requests that the Draft EIR be revised as set forth below: C-10

1. Draft EIR, p. 2.0-1

The Draft EIR describes CalPeco as an "also known as" of NV Energy. This statement is incorrect. California Pacific Electric Company, LLC ("CalPeco") acquired

[23] Draft EIR, p. 3.2-24.
[24] Draft EIR, p. 3.2-24.

Letter C Continued

and assumed responsibility for operating the California electric distribution system previously owned and operated by Sierra. Sierra is a Nevada corporation and a wholly-owned subsidiary of NV Energy, Inc. CalPeco has no corporate affiliation with either Sierra or NV Energy.

The Draft EIR does correctly reflect that CalPeco also does business in California as Liberty Utilities. To be clear, CalPeco is the California electric utility that holds the Certificate of Public Convenience and Necessity ("CPCN") to provide electric service in California and is the entity subject to regulation by the California Public Utilities Commission. Therefore, while CalPeco does business in California as "Liberty Utilities," the legal identity of the CPUC-regulated public utility remains CalPeco.

C-10 cont.

Accordingly, the Draft EIR should modify the statement on page 2.0-1 as indicated below:

> TDPUD also provides power to the western portion of the Glenshire community through a distribution feed that is shared with NV Energy ~~(also known as California Pacific Electric Company, LLC (CalPeco) dba Liberty Utilities)~~.

2. Draft EIR, p. 3.2-22

As described above, Liberty Utilities has no corporate affiliation with NV Energy, Nevada Power, Sierra or Sierra Pacific Resources. Accordingly, the reference to Liberty Utilities contained on page 3.2-22 should be deleted and the reference revised as set forth below:

C-11

> Nevada Power, Sierra Pacific Power, and Sierra Pacific Resources merged in July 1999 ~~to create a subsidiary of NV Energy, also known as Liberty Utilities~~. The parent company of each is now NV Energy.

3. Draft EIR, page 2.0-6

The second sentence of the paragraph regarding Area 6 should be revised to more accurately recite the facts and absence of any precedential consequence:

> In late 2010, Union Pacific Railroad (UNP) requested TDPUD to provide electric service to certain new communication facilities which UNP was installing within the electric service territory then operated by Sierra. Sierra agreed to TDPUD's request on the basis that the location of the required incremental service for UNP and the location of the respective existing electric facilities of TDPUD and Sierra, the most cost-effective way to build the facilities necessary to serve the incremental UNP load would be for TDPUD to build the facilities. Sierra's permission to allow

C-12

Letter C Continued

TDPUD to install new facilities to serve UNP does not relate to the comparative ability of Sierra (and now CalPeco) and TDPUD to provide electric service with existing facilities to the Northstar Area, the North of Truckee Area, or any other area which is assessed within this Draft EIR. **C-12 cont.**

Conclusion

As explained above, CalPeco supports the Draft EIR's overall analysis which demonstrates that the LAFCo-recommended SOI is environmentally superior to the District-preferred SOI and thus provides further support for the Commission to adopt the LAFCo-recommended SOI. Furthermore, the Draft EIR should correct the inappropriate assumptions made as part of its GHG emissions analysis and the factual errors to eliminate any reference that incorrectly states that CalPeco (dba Liberty Utilities) has a corporate affiliation with NV Energy or Sierra Pacific Power. **C-13**

Sincerely,

Michael Smart, P.E.
President
California Pacific Energy Company, LLC

Letter C Continued

ATTACHMENT 1

Letter C Continued

POWER NETWORK POWER MANAGING POWER COAL POWER GAS POWER Store Jobs Buyers' Guide

POWER
BUSINESS AND TECHNOLOGY FOR THE GLOBAL GENERATION INDUSTRY

ELECTRIC POWER

Coal Gas Nuclear Renewables Smart Grid Business Environmental O&M

Hot Topics : Water | Wind | Instrumentation & Controls

October 15, 2008

TS Power Plant, Eureka County, Nevada

Dr. Robert Peltier PE

Owner: Newmont Mining Corp.
Operator: DTE Energy Services

Top Plant: Not all coal-fired power plants are constructed by investor-owned utilities or independent power producers selling to wholesale markets. When Newmont Mining Corp. recognized that local power supplies were inadequate and too expensive to meet long-term electricity needs for its major gold- and copper-mining operations in northern Nevada, it built its own generation. What's more, Newmont's privately owned 200-MW net coal-fired plant features power plant technologies that will surely become industry standards. Newmont's investment in power and technology is also golden: The capital cost will be paid back in about eight years.

Newmont Mining Corp., founded in 1921, is one of the world's leading gold producers and has operations on five continents. Newmont has been actively mining gold in Nevada for more than 40 years at several sites. About 35% of its global reserves are located in Nevada.

In June, Newmont placed its 242-MW gross output greenfield TS Power Plant (TSPP) into commercial service in answer to rising mining operation power costs—the company's second-highest cost of operation after labor. The new coal-fired plant is located on Newmont's TS Ranch in Eureka County, approximately 60 miles west of Elko (Figure 1).

1. Middle of nowhere. The TS Power Plant is sited in a very remote part of Nevada and supports Newmont's gold-mining operations. The location created significant logistical and transportation challenges as well as construction labor market pressures. The facility is projected to reduce Newmont's Nevada mining operations' current cash operating costs by approximately $25 per ounce of gold. Courtesy: Fluor Power

Approximately 130 MW of TSPP's generation will be used for mining operations, including Newmont's new Phoenix Project; the remainder will be sold to Sierra Pacific Power Co. The Phoenix Project is projected to deliver between 200,000 and 250,000 ounces of gold from an open pit gold mine and 1.3 billion pounds of copper as a mining by-product over its projected 20-year project life. The TS Power Plant is estimated to save between $70 million and $80 million a year in power costs for these mining operations.

The facility was commissioned only 27 months after the full notice to proceed. Successful performance testing was completed 10 weeks early, and full load was achieved only 27 days after first fire on coal (Figure 2).

Letter C Continued

2. Early arrival. The TS Power Plant was commissioned in early 2008, only 27 months after the full notice to proceed. Newmont consumes approximately 65% of the energy generated by TSPP; the remaining 35% is sold to Sierra Pacific Power. Courtesy: Fluor Power

TSPP is an excellent example of the future of modern pulverized coal plant design and makes the plant an easy Top Plant selection. Newmont integrated the most advanced technologies available to plant designers in three specific areas.

Air quality control systems. Newmont took the high road when selecting the plant's state-of-the-art air quality control systems (AQCS), which include a cost-effective approach to maximizing the co-benefit mercury removal in the downstream scrubber and fabric filter. TSPP is one of the first commercial installations of a brominated powdered activated carbon (PAC) system with sorbent enhancement at a full-scale power plant, one of the first commercial installations of a mercury continuous emissions monitoring system (CEMS) at a power facility, and it is certified to comply with the anticipated mercury emissions reporting requirements—a first for a new greenfield plant.

As soon as the plant completed contract acceptance testing, the first order of business was to run a spread of mercury removal tests with various amounts of sorbent and coal halogen additions to begin characterizing the plant's mercury removal capability. We'll discuss the results of all the AQCS tests later in this article.

Digital architectures. TSPP is outfitted with perhaps the most advanced digital bus technologies framework ever installed at a power plant and uses these technologies (including Foundation Fieldbus, Profibus, and DeviceNet) to the maximum extent possible for system monitoring as well as specific control functions. These digital controls applications saved millions of capital dollars in cable purchases and associated construction costs, saved schedule time by accelerating soft loop checks, and saved future O&M costs (when compared to conventional hardwired analog control systems).

Steam cycle design. The most straightforward approach to achieving maximum plant efficiency and lower emissions is to employ higher superheat temperatures. But higher temperatures come at the cost of advanced and difficult-to-procure metallurgy for the steam piping and the steam turbine. After many economic studies, Newmont selected 1,050F as the plant's main steam and hot reheat steam temperatures operating on a 2,400 psig subcritical cycle after determining that higher capital costs—in return for a lower heat rate and emissions—were a good investment.

Letter C Continued

ATTACHMENT 2

Letter C Continued

If you have difficulty making a payment, contact us at the telephone number shown on your bill. We may be able to make payment arrangements with you depending upon a number of factors, including your past credit history.

Another payment option for residential customers is an equal payment plan. We'll take your average power usage and divide into equal monthly payments. So you'll know in advance what your bill will be each month. Call Customer Service at 775.834.4444.

If anyone residing at this address is either disabled or 62 years of age or older, please contact the telephone number shown on your bill so we can update your account information.

Visit
nvenergy.com
for details about various payment options, energy conservation and energy assistance programs.

NVEnergy.
nvenergy.com

NVE-North / LVCG_ 320M 01/12

Sierra Pacific d/b/a NV Energy Power Content Label

Sources of Energy

Annually, Sierra Pacific Power, d/b/a NV Energy, generates approximately 53 percent of the electricity needed to supply our customers. The balance of power used to serve our customers is purchased from the "grid," a transmission network connected to various generating facilities in the Western United States. Electricity, when purchased in this way cannot be labeled as coming from any one particular source. The following table represents our average fuel mix from both our own generation and the power purchased to serve you.

ENERGY SOURCE	MEGAWATT HOURS	% OF TOTAL
Coal	2,480,921	32.61%
Natural Gas	3,438,350	45.20%
Oil	2,115	0.03%
Hydroelectric	635,002	8.35%
Geothermal	797,499	10.48%
Solar	1,731	0.02%
Nuclear	190,768	2.51%
Wind	36,154	0.48%
Biofuel	17,308	0.23%
Biomass	5,961	0.08%
Other	1,923	0.03%
Total	**7,607,731**	**100.00%**

Letter C Continued

Emissions of Energy Sources

At NV Energy we care about the environment, just like you. Therefore, we continuously strive to operate all our facilities at less than permitted emission limits approved by the regulatory authorities (U.S. Environmental Protection Agency and Nevada Division of Environmental Protection). The provided emissions data is derived from actual NV Energy reported emissions and regional averages to account for purchased power.

SPECIFIC EMISSION TYPE	POUNDS PER MEGAWATT–HOUR
High–level Radioactive Waste	n/a
Sulfur Dioxide	2.58
Carbon Dioxide	1,494.83
Carbon Monoxide	0.13
Particulate Matter	0.07
Volatile Organic Compounds	0.01
Oxides of Nitrogen	1.53
Heavy Metals	<0.01

*Above tables calculated in compliance with Nevada Administrative Code, NAC704.2785.

Energy Conservation

Making your home more energy efficient can help reduce high energy bills while improving your level of comfort. NV Energy offers a number of programs and services designed to help our customers save electricity and money. Learn more at nvenergy.com.

Tips for Recycling and Disposing Electronic Waste

Did you know that your energy efficient Compact Fluorescent Lamps (CFLs) and electronic waste such as computers, televisions, VCRs, DVD players could contain materials potentially hazardous to the environment? Electronic waste is one of the fastest growing segments of our nation's waste stream; however, the good news is that many of these products can be reused, refurbished, or recycled.

Here are some ideas for safe disposal of CFLs and electronic waste. CFLs can be recycled for free at any Home Depot and most Lowe's stores throughout the United States. The stores maintain drop off bins at the customer service desk at each location.

In addition, in northern Nevada, NV Energy is partnering with Waste Management Inc. to offer a "free to the customer" recycling program for CFLs. NV Energy residential customers can take their unbroken defunct bulbs to one of eight Waste Management facilities. Please call 775-329-8822, ext. 2339 for the location nearest you.

Since many electronic wastes can be reused or refurbished, they can be donated to select organizations or can be given to stores that refurbish electronics. If your electronics cannot be refurbished or reused, then they should be recycled and your local waste service company can provide further information regarding the safe handling of these materials.

The following website links also provide information about electronic recycling and offer some options right here in our state:

www.electronicstakeback.com/recycling/recyclers_chart.htm#NVsources

http://nevadarecycles.gov/

Further information is also provided at epa.gov/ecycling.

Energy Assistance Sources

The state of Nevada **Energy Assistance Program (EAP)** can help low–income customers pay their energy bills and/or weatherize their homes. To qualify, you must be a residential customer and meet certain income guidelines.

To find out if you qualify or for more information about the Energy Assistance Program call 775.684.0730 or visit dwss.nv.gov.

For Weatherization Assistance, call 775.687.2040.

The **Special Assistance Fund for Energy (SAFE)** is NV Energy's energy assistance program in northern Nevada. Based on a number of criteria, partner agencies determine eligibility for SAFE. For more information, call the number listed on your bill.

Continued on back panel

Letter C Continued

If you have difficulty making a payment, contact us at the telephone number shown on your bill. We may be able to make payment arrangements with you depending upon a number of factors, including your past credit history.

Another payment option for residential customers is an equal payment plan. We'll take your average power usage and divide into equal monthly payments. So you'll know in advance what your bill will be each month. Call Customer Service at 775.834.4444.

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NVEnergy.
nvenergy.com

NVE-North / NC 310M 12/12

Sierra Pacific d/b/a NV Energy Power Content Label

Sources of Energy

Annually, Sierra Pacific Power, d/b/a NV Energy, generates approximately 54 percent of the electricity needed to supply our customers. The balance of power used to serve our customers is purchased from the "grid," a transmission network connected to various generating facilities in the Western United States. Electricity, when purchased in this way cannot be labeled as coming from any one particular source. The following table represents our average fuel mix from both our own generation and the power purchased to serve you for the 12-month period ending September 30, 2012.

ENERGY SOURCE	MEGAWATT HOURS	% OF TOTAL
Coal	1,679,486	21.22%
Natural Gas	4,761,215	60.16%
Oil	1,890	0.02%
Hydroelectric	489,190	6.18%
Geothermal	674,061	8.52%
Solar	37,262	0.47%
Nuclear	148,469	1.88%
Wind	87,122	1.10%
Biofuel	13,919	0.18%
Biomass	21,824	0.28%
Other	0	0.00%
Total	**7,914,439**	**100.00%**

Letter C Continued

Emissions of Energy Sources

At NV Energy we care about the environment, just like you. Therefore, we continuously strive to operate all our facilities at less than permitted emission limits approved by the regulatory authorities (U.S. Environmental Protection Agency and Nevada Division of Environmental Protection). The provided emissions data is derived from actual NV Energy reported emissions and regional averages to account for purchased power.

SPECIFIC EMISSION TYPE	POUNDS PER MEGAWATT–HOUR
High–level Radioactive Waste	n/a
Sulfur Dioxide	1.94
Carbon Dioxide	1,247.83
Carbon Monoxide	0.22
Particulate Matter	0.09
Volatile Organic Compounds	0.02
Oxides of Nitrogen	1.25
Heavy Metals	<0.01

*The above tables are calculated in compliance with Nevada Administrative Code, NAC704.2785. Company data is based on a 12-month period ending September 30, 2012.

Energy Conservation

Making your home more energy efficient can help reduce high energy bills while improving your level of comfort. NV Energy offers a number of programs and services designed to help our customers save electricity and money. Learn more at nvenergy.com.

Tips for Recycling and Disposing Electronic Waste

Did you know that your energy efficient Compact Fluorescent Lamps (CFLs) and electronic waste such as computers, televisions, VCRs, DVD players could contain materials potentially hazardous to the environment? Electronic waste is one of the fastest growing segments of our nation's waste stream; however, the good news is that many of these products can be reused, refurbished, or recycled.

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The following website links also provide information about electronic recycling and offer some options right here in our state:

www.electronicstakeback.com/how-to-recycle-electronics/

http://nevadarecycles.gov/

Further information is also provided at epa.gov/recycling/

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The state of Nevada **Energy Assistance Program (EAP)** can help low–income customers pay their energy bills and/or weatherize their homes. To qualify, you must be a residential customer and meet certain income guidelines.

To find out if you qualify or for more information about the Energy Assistance Program call 775.684.0730 or visit dwss.nv.gov.

For Weatherization Assistance, call 775.687.2040.

The **Special Assistance Fund for Energy (SAFE)** is NV Energy's energy assistance program in northern Nevada. Based on a number of criteria, partner agencies determine eligibility for SAFE. For more information, call the number listed on your bill.

Continued on back panel

Letter C **Michael Smart, President, Liberty Utilities California Pacific Electric Company (CalPeco)**

Response C-1: The commenter states that CalPeco supports the LAFCo-recommended electric service SOI and opposes the District-preferred electric service SOI. The commenter also requests written responses to his comments such as those provided herein. The comment is noted for Nevada County LAFCo's consideration.

Response C-2: The commenter reiterates CalPeco's support of the LAFCo-recommend electric service SOI and additionally notes that CalPeco already has the facilities in place within the 3-square-mile Northstar area and the 25.5-square-mile area north of Truckee in order to continue to provide electric service to these areas. The comment is noted for Nevada County LAFCo's consideration. The commenter is referred to Response C-3 regarding the environmental benefits of the LAFCo-recommend electric service SOI over the TDPUD-preferred SOI.

Response C-3: The commenter states that CalPeco concurs with the Draft EIR's conclusions that with respect to each of the analyzed environmental issue areas, the District-preferred SOI scenarios would result in greater impacts than the LAFCo-recommended SOI.

The Draft EIR concluded that the District-preferred SOI scenarios would result in greater impacts than the LAFCo-recommended SOI in terms of consistency with applicable plans and polices under Impacts 3.1.1 and 3.1.2 (pages 3.1-10 through -12). The Draft EIR also concluded that the District-preferred SOI scenarios would result in greater extent of impacts than the LAFCo-recommended SOI in terms of growth inducement under Impact 3.3.1 (pages 3.3-25 through -51). The comment is noted for Nevada County LAFCo's consideration.

Response C-4: The commenter proposes changes to the impacts analysis of the Draft EIR's Section 3.2, Climate Change and Greenhouse Gases, regarding the use of the most up-to-date and appropriate data. The commenter is referred to Master Response 2.4.

Response C-5: The commenter expresses concern regarding the selection of data used to complete the analysis in Draft EIR Section 3.2, Climate Change and Greenhouse Gases, specifically the greenhouse gas emission intensity factors used to quantify project emissions from energy generation. The commenter is referred to Master Response 2.4 whereby it is more fully described that the data utilized in the originally published Draft EIR was obtained from a combination of public data sources including the California Public Utilities Commission, the California Energy Commission, and the electrical service providers themselves.

As noted in Master Response 2.4, updated emission intensity factors (including power source mix and more recent data) specific to CalPeco and the TDPUD were solicited and obtained in April 2013. This data was utilized in the re-estimation of GHG emissions and is reported in **Appendix A** (see **Tables 3.2-10**, **3.2-11,** and **3.2-12**). The re-modeling identified reduced

GHG emissions for both CalPeco (from 67,837 metric tons annually in the original Draft EIR to 61,808 metric tons annually [6,029 metric ton reduction]) and the TDPUD (from 45,130 metric tons annually in the original Draft EIR to 31,758 metric tons annually [13,372 metric ton reduction]). However, the Draft EIR impact conclusions for Impact 3.2.1 would remain the same, as GHG emissions would still exceed the BAAQMD numeric threshold for GHG per service population (4.6 metric tons). The less than significant impact determination for Draft EIR Impact 3.2.2 would also remain the same, even with the GHG emissions reductions.

Response C-6: The commenter states that the Draft EIR fails to account for the differences in the delivery of power between the TDPUD and CalPeco in terms of greenhouse gas generation.

The commenter is referred to Master Response 2.4. Since circulation of the Draft EIR, PMC has employed updated greenhouse gas emission intensity factors derived from utility-specific data received from both CalPeco and the TDPUD, which accounts for the respective GHG emissions from each provider's transmission paths, among other factors, to re-model projected greenhouse gas emissions. The commenter is referred to **Appendix A**, the revised Draft EIR Section 3.2, specifically subsection 3.2.3, Impacts and Mitigation Measures**.**

Response C-7: The commenter requests that the Draft EIR assess potential environmental impacts associated with the installation of new TDPUD facilities.

Section 3.3 of the Draft EIR provides a summary of the significant physical environmental impacts of general plan growth and infrastructure extension in the project area that the proposed new SOI would support. The Sierra County General Plan, Placer County General Plan, Martis Valley Community Plan, Town of Truckee General Plan, and Nevada County General Plan provide for land use development patterns and growth policies that allow for the orderly expansion of development to which the TDPUD could provide supporting electric and water services in areas within the District's service area with the proposed SOI update. The associated general plan EIRs, subsequent project EIRs, or environmental studies evaluated the physical environmental effects of growth and associated infrastructure extension in the project area. The discussion of the significant environmental impacts is based on technical analysis from the Sierra County General Plan, Placer County General Plan EIR, Martis Valley Community Plan EIR, Nevada County General Plan EIR, and Town of Truckee General Plan EIR.

It is also noted that it would be speculative at this time to identify what specific physical facility improvements (if any) would be required in the event that the TDPUD annexes areas in the District-preferred SOI and that are now served by CalPeco. For instance, the TDPUD's current plans call for it to purchase and operate existing infrastructure in future annexation areas currently being provided electrical service, with little to no need for the construction of new improvements. However, Section 15145 of the State CEQA Guidelines directs that a lead agency should terminate its discussion of a subject in the event that a topic is too speculative to

conclusively make a determination on the matter. In this instance, the discussion is premature and speculative, as the specific engineering studies necessary to address this question have not been prepared and thus the potential impacts have not been further analyzed. Should the need for such utility improvements be identified in the future, project-level environmental review and compliance under CEQA will be required prior to their approval.

Response C-8: The commenter states that CalPeco already serves electric consumers in the 3-square-mile Northstar area and the 25.5-square-mile area north of Truckee with existing facilities and that the Draft EIR should recognize the environmental benefits of the LAFCo-recommended SOI as it requires that no new facilities be constructed.

As noted under Impact 3.3.1 in Section 3.3 of the Draft EIR, the TDPUD-preferred SOI scenario would generally result in greater impacts than the LAFCo-recommended SOI given the larger extent of development potential. However, as stated on page 3.3-24 of the Draft EIR, the proposed project consists only of the establishment of a new SOI for the TDPUD as part of the mandated five-year Sphere of Influence review process for Nevada LAFCo, and no other actions (i.e., annexations, infrastructure extensions, or facility installations or improvements) are being sought at this time. Therefore, it would be overly speculative to specifically analyze the installation of new facilities; as such, an action is not proposed at this time. Should the need for such utility improvements be identified in the future, project-level environmental review and compliance under CEQA will be required prior to their approval. The commenter is referred to Response C-7 regarding the programmatic environmental analysis of growth and associated infrastructure needs of the area based on local general plans and their associated EIRs.

Response C-9: The commenter recommends revisions to DEIR Section 3.2, Climate Change and Greenhouse Gases, in order to negate any negative inference regarding CalPeco's ability to execute commercial arrangements to satisfy the California Renewables Portfolio Standards for the years after 2015. The commenter is referred to **Appendix A**, the revised Draft EIR Section 3.2, specifically page 3.2-28 under Impact 3.2.2, which contains a discussion that addresses this comment**.** For instance, as stated on page 3.2-28 of the revised Section 3.2:

> *The purchase power contract involving Liberty Utilities CalPeco's supply of electricity to its California customers guarantees the delivery of a specific and minimum verifiable amount of renewable energy (Smart 2012). The amount of guaranteed renewable energy for 2012 and 2013 is 20 percent (Smart 2012). The amount of renewable energy mix supplied to Liberty Utilities CalPeco's California customers in 2014 is set at 21.7 percent, and in 2015 the renewable mix percentage is contractually set at 23.3 percent (Smart 2012). A new renewable energy mix requirements contract has yet to be established for years beyond 2015. While Liberty Utilities CalPeco has yet to execute any contracts relating to its procurement of Renewables Portfolio Standard–eligible*

> *energy for the years beyond 2015, Liberty Utilities CalPeco is actively exploring its options and is confident that it will be able to enter the necessary commercial arrangements to satisfy its requirements under the Renewables Portfolio Standard program in 2016 and in the ensuing years...*

It is additionally noted that the growth accommodated by and envisioned within the respective general plan documents is anticipated to occur over an extended period of time, thus allowing all existing and future service providers time to adjust the level of service and portfolio composition appropriately to serve new demand while meeting required portfolio standards.

Response C-10: The commenter notes that page 2.0-1 of the Draft EIR contains an incorrect statement.

The Draft EIR has been modified to revise this statement, and the commenter is referred to FEIR Section 3.0, Errata. The following text has been added in Draft EIR Section 2.0, page 2.0-1, Project Setting:

> The TDPUD also provides power to the western portion of the Glenshire community through a distribution feed that is shared with NV Energy ~~(also known as California Pacific Electric Company, LLC (CalPeco) dba Liberty Utilities)~~.

Response C-11: The commenter notes that Liberty Utilities has no corporate affiliation with NV Energy, Nevada Power, Sierra, or Sierra Pacific Resources and points out an incorrect statement regarding corporate affiliation on page 3.2-22 of the Draft EIR. The commenter is referred to **Appendix A**, the revised Draft EIR Section 3.2, specifically page 3.2-26, which amends the discussion of corporate affiliation.

Response C-12: The commenter notes that the description of Area 6 on page 2.0-6 does not fully recite all of the facts surrounding the near-term sphere for electric service. The Draft EIR has been modified to address the comment, and the commenter is referred to FEIR Section 3.0, Errata. The following text has been revised in Draft EIR Section 2.0, page 2.0-6, to address this comment:

> Area 6: Includes properties owned by Union Pacific Railroad in Placer County south of Donner Lake following the route of the rail line. <u>In late 2010, Union Pacific Railroad (UPR) requested the TDPUD to provide electric service to certain new communication facilities which UPR was installing within the electric service territory then operated by Sierra. Sierra agreed to the TDPUD's request on the basis that because of the location of the required incremental service for UPR and the location of the respective existing electric facilities of the TDPUD and Sierra, the most cost-effective way to build the facilities necessary to serve the incremental UPR load would be for the TDPUD to build the facilities. Sierra's permission to allow the TDPUD to install new facilities to service UPR does not relate to the comparative ability of Sierra (and now CalPeco) and the TDPUD to provide electric service with existing facilities to the 3-square-mile Northstar area, the 25.5-square-mile area north of Truckee, or any other area which is assessed with this EIR.</u>

~~Union Pacific Railroad (UPR) has requested service, Liberty Utilities has agreed to allow the District to provide service, and the California Public Utilities Commission (CPUC) has given Liberty Utilities its approval. In 2012, the District applied to Placer LAFCo for annexation of these properties.~~

Response C-13: The commenter reiterates that CalPeco supports the Draft EIR's conclusion that the LAFCo-recommend SOI is environmentally superior to the District-preferred SOI and further reiterates his suggestion for changes to the Draft EIR's Section 3.2, Climate Change and Greenhouse Gases, in terms of the most up-to-date and appropriate data. The comment is noted for Nevada County LAFCo's consideration, and the commenter is referred to **Appendix A**, the revised Draft EIR Section 3.2, Climate Change and Greenhouse Gases, specifically subsection 3.2.3, Impacts and Mitigation Measures, as well as to Response C-3.

Letter D

Truckee Donner Public Utility District

SR Jones, Executive Officer
Nevada Local Agency Formation Commission
950 Maidu Avenue
Nevada City, CA 95959-8617

Re: Truckee Donner PUD's Comments to the TDPUD Draft Environmental Impact Report; dated February 2013

Dear Ms. Jones:

The District has reviewed the Draft EIR prepared by Pacific Municipal Consultants (PMC) for the District's Sphere of Influence Update and submits the following comments:

General Comments

1. The Draft EIR fails to recognize, disclose, or analyze the impacts of GHG emissions resulting from LAFCo's recommended SOI as compared to TDPUD's *current* electric SOI. Shrinking TDPUD's current SOI as recommended by LAFCo will ensure that a private electric utility company, such as Liberty Utilities, becomes the permanent electric service provider. In fact, it is likely that Liberty Utilities would become the electric service provider in the areas taken out of TDPUD's SOI that are adjacent to Liberty Utilities' current service territory. Therefore, LAFCo must review, consider and compare the potential environmental impacts of GHG emissions if Liberty Utilities were the electrical service provider, rather than the TDPUD, in the areas LAFCo recommends removing from TDPUD's current SOI. Based on current data, those impacts are likely to be significant, but avoidable, by simply not reducing TDPUD's current electric SOI. LAFCo is only required to *update* TDPUD's electric sphere. LAFCo is *not* required to change it. Approval of a final EIR with this deficiency would be arbitrary and capricious and constitute an abuse of discretion. **D-1**

2. The Draft EIR fails to reference or discuss two significant documents: The TDPUD Public Review Draft Sphere of Influence Update and Municipal Service Review prepared by Michael Brandman Associates in May, 2011; and the District's Report to Nevada LAFCo dated April 2012, which also included an Electrical Service Plan (as Exhibit 7). These are **D-2**

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Letter D Continued

major omissions and should be included to provide the public and the Commission additional background information on the TDPUD. **D-2 cont.**

3. That area within Placer County currently served by the Placer County Water Agency (PCWA) should be excluded from the TDPUD's Water Preferred SOI. **D-3**

4. Section 3.2 Climate Change and Greenhouse Gases fails to adequately evaluate the environmental impact of reducing the TDPUD's current SOI in favor of Nevada LAFCo's proposed SOI. Had the impact been properly evaluated the proposed project will result in a significant increase in greenhouse gas emissions that will have a profound impact on the environment. **D-4**

5. The failure of using same year data for analysis of greenhouse gas emissions between the Truckee Donner PUD and Liberty Utilities. See Exhibit 1, letter to Michael D. Holley, TDPUD Available Electric Utility Data. **D-5**

6. While the Draft EIR is not required to consider the economic impacts of the different SOI scenarios and project alternatives, in the process of updating TDPUD's SOIs, Nevada LAFCo will need to consider those economic impacts. One such economic impact that stands out is the impact to the rates for electric service paid by the customers of the TDPUD compared to the rates paid by the customers of Liberty Utilities. As discussed in greater detail below, Liberty Utilities will need to severely increase its rates simply to be able to achieve the requirements of the State of California's Renewables Portfolio Standard program. Adoption of the LAFCo recommended SOI will have a devastating economic impact on the residents of the Truckee area as compared to adoption of the TDPUD preferred SOIs. See Exhibit 2, Memo from Robert Mescher to Michael Holley regarding 10 Year Projection for Liberty Energy Customer Rates Increases vs. TDPUD Rate Increases. **D-6**

Specific Comments

ES-1

Inaccurate description – Nevada LAFCo's description of the TDPUD's electric department is incorrect. It currently reads "The TDPUD operates 133 miles of primary overhead and 82 miles if primary underground electrical distribution circuits. Power is provided through 4 electrical substations and through 15 distribution circuits throughout Truckee." **D-7**

Recommended language: The Electric Department owns and operates approximately 135 miles of primary overhead and 83 miles of primary underground electrical distribution circuits. Power is provided through four

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electric substations, one distribution metering point and distributed from 17 distribution circuits throughout the greater Truckee area. **D-7 cont.**

Inappropriate/inaccurate reference - Table ES-1, Impact 3.1.1 currently states that "The LAFCo proposed SOI and the TDPUD-preferred SOI would not conflict with local agency land use policies or regulations. However, the TDPUD-preferred SOI update (electric and water) would conflict with Nevada LAFCo policies related to the extent of the SOI boundaries. This impact is potentially significant for the TDPUD-preferred SOI update for both electric and water service." The discussion of the Standards of Significance on page 3.1-9 makes it clear that under the CEQA Guidelines Appendix G adopted by Nevada LAFCo a project would have a significant impact if it would "Conflict with any applicable land use plan, policy, or regulation of any agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigation [of] an environmental effect." (Emphasis added.) Nevada LAFCo is not a land use agency and its policies are not land use ("Neither Nevada County LAFCO nor the TDPUD has any land use regulatory authority or land use approval authority." Page 2.0-5). Therefore, even if the TDPUD preferred SOIs for electric and water service conflict with Nevada LAFCo policies related to the extent of the SOI boundaries (which the TDPUD does not concede), such a conflict is not a potentially significant impact. **D-8**

ES-2

Incorrect and prejudicial statement – TDPUD takes exception with the statement that reads "the establishment of a new SOI is the first step in a series of actions that could provide water and electrical service to land areas within the Town of Truckee, Placer County, Sierra County and Nevada County . . ." (Emphasis added.) Because TDPUD is a provider of service (water and electrical), any new areas which it serves are dependent on entitlements and development plans approved by the local agencies with land use authority. The District's SOIs are simply an indication that the District has the ability, and desire, to provide water and electrical service to new areas. **D-9**

ES-2

Incorrect data – The report currently reads "The TDPUD also provides power to the western portion of the Glenshire community through a **D-10**

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distribution metering point from NV Energy; Liberty Utilities provides no services to the TDPUD."

Recommended Language: The Electric Department owns and operates approximately 135 miles of primary overhead and 83 miles of primary underground electrical distribution circuits. Power is provided through four electric substations and one distribution metering point and distributed from 17 distribution circuits throughout the Truckee area.

D-10 cont.

The District has 17 individual circuits

ES-3 Table ES-1, Impact 3.1.1

Unclear statements - Table ES-1 within the Executive Summary does not clearly, nor consistently, differentiate between the Nevada LAFCo recommended alternative and the TDPUD preferred alternative within the Level of Significance Without Mitigation column.

But the report reads, "The LACO-recommended and the TDPUD-preferred Sphere of Influence for the TDPUD would not conflict with local agency land use policies or regulations. However, the TDPUD-preferred SOI update (electric and water) would conflict with Nevada LAFCo policies related to the extent of the SOI boundaries. This impact is potentially significant for the TDPUD-preferred SOI update for both electric and water service."

D-11

The discussion of the Standards of Significance on page 3.1-9 makes it clear that under CEQA Guidelines Appendix G adopted by Nevada LAFCo, a project would have a significant impact if it would "Conflict with any applicable *land use* plan, policy, or regulation of any agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigation [of] an environmental effect." (Emphasis added.) Nevada LAFCo is not a land use agency and its policies are not land use policies ("Neither Nevada County LAFCO nor the TDPUD has any land use regulatory authority or land use approval authority." Page 2.0-5). Therefore, even if the TDPUD preferred SOIs for electric and water service conflict with Nevada LAFCo policies related to the extent of the SOI

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boundaries (which the TDPUD does not concede), such a conflict is not a potentially significant impact. **D-11 cont.**

ES-3

Inconsistency with Report - Mitigation Measure 3.1.1 currently reads "...the sphere of influence plan shall include a policy that annexations will be approved only when the land use designation of the subject territory indicates development potential that requires the support of water and/or electrical service."

Recommended Language - "Should Nevada LAFCo wish to adopt the TDPUD-preferred Sphere of Influence for electric and water services, the sphere of influence plan shall include a policy that annexations will be approved only when water and electrical services are needed to serve actual development. Current TDPUD District Code 5.53.010.2. states "No service shall be provided without prior annexation approval from the appropriate LAFCo". **D-12**

ES-4

Internal inconsistency - Level of significance without mitigation should be CC, similar to Impact 3.3.0 **D-13**

1.0-1

1.3 Relationship to Municipal General Plans

Incorrect information – The document reads "The current TDPUD Sphere of Influence boundary which was established in 1983, with the Nevada County portion updated in 1998 ..." **D-14**

Recommended language – The current TDPUD Sphere of Influence boundary was established in 1983 and updated in 1998."

1.0-2

1.4 Trustee and Responsible Agencies

Unsupported conclusion - The document concludes that there are no interests that concern Trustee or Responsible Agencies because the project does not lead directly to construction. However, the Draft EIR admits to numerous 'secondary impacts' that will be significant and unavoidable; and are in fact, primary concerns to those agencies with land use authority. It is believed that these agencies are very much interested in the District's SOI. These agencies should be identified in the document. **D-15**

1.0-2

1.5 Organization and Scope

Missing data - This section indicates that the Draft EIR has considered nearby projects; but no listing or discussion of specific projects is provided. With major emphasis in the Draft EIR on General and Specific Plans, information and mapping on these plans should be provided. For example, **D-16**

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there is no map showing the SOI for the Town of Truckee, which has a great deal of relevance when determining the future service area for the District. Include these plans as attachments and provide written descriptions as to how these plans have been used in determining the environmental impact of the proposed projects. **D-16 cont.**

1.0-7

1.7 Comments Received on the Notice of Preparation
Missing data - Letters from both the Northstar Community Service District (8/30/11) and the Northstar Property Owners Association (9/8/11), which were submitted with the TDPUD Report to the Nevada Local Agency Formation Commission dated May 2012, are missing in Appendix 1.0-A; Exhibit 3 and Exhibit4. **D-17**

2.0-1

2.2 Project Setting
Incorrect data - Incorrect data, miles of line, overhead and underground, metering point and number of distribution points. The TDPUD also provides power to the western portion of the Glenshire community through a distribution metering point from NV Energy; Liberty Utilities provides no services to the TDPUD.

Recommended Language: The Electric Department owns and operates approximately 135 miles of primary overhead and 83 miles of primary underground electrical distribution circuits. Power is provided through four electric substations and one distribution metering point and distributed from 17 distribution circuits throughout the Truckee area. **D-18**

The District has 17 individual circuits

Same incorrect data located in the TDPUD SOI Update Initial Study-pg. 10

2.0-2

2.3 Project Objectives
Report inadequacy - The Draft EIR fails to adequately describe the objectives of the TDPUD. Without these objectives clarified, the Project Alternatives cannot be evaluated as to how they do or do not meet project objectives. The Objectives section merely cites two code sections of the Cortese-Knox-Hertzberg Legislation(C-K-H). The Draft EIR fails to describe a project purpose, and the rationale for the District's SOI scenarios and LAFCo's scenario (as required by C-K-H). Hence the need to include analysis from the Draft SOI/MSR and the District's Report to the Commission. Currently, there is no clear linkage between the MSR analysis and the Draft EIR. Therefore, it is not possible to compare the magnitude of impacts in relation to the benefits anticipated in making the findings that are needed to cover the cited significant and unavoidable impacts. **D-19**

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	Incorrect information - The current SOI for the TDPUD was established in 1983, and the Nevada County portion was updated in 1998. Correct information - The current SOI for the TDPUD was established in 1983, and was updated in 1998.	D-20
	Incorrect information - Sentence in third paragraph beginning "The TDPUD electric service SOI was determined to be almost conterminous..." should be deleted. The TDPUD service territory is not coterminous with the existing TDPUD Sphere of Influence. Yet Figure 2.0-1 shows that the existing SOI is substantially larger; Figure 2.0-1 includes areas north, west and east of Hobart Mills, west of Donner Lake, a very large portion south into Placer County and east of the Glenshire Subdivision.	D-21
2.0-3	Figure 2.0-1 Existing Sphere of Influence Missing data - This figure should also show the Town of Truckee SOI, and the discussion should show the relationship of that SOI to the alternatives.	D-22
	Missing data - The Draft EIR should also include General Plan Land Use Maps for the Town of Truckee, Nevada County, Placer County and Sierra County. These might be appropriate in the Appendix.	D-23
2.0-5-6	2.5 Project Description Report inconsistency - The eleven areas discussed on page 2.0-6 do not match the numbered areas in Figure 2.0-2.	D-24
2.0-9	Long-Term Sphere for Electric Service Unsupported conclusion – When it is most economical for the closest electrical utility to provide service, the two electric utilities can enter into a Fringe Area Agreement. The TDPUD and Liberty Utilities are currently using Fringe Area Agreements in such instances. Also see Exhibit 2 for the 10 Year Projection for Liberty Energy Customer Rates Increases vs. TDPUD Increases (Both Exhibits had been included in the Report to Nevada Local Agency Formation Commission dated May 2012)	D-25
2.0-9	Insufficient clarity - The addition of the Northstar area is to be within the Electric Service Sphere only. This distinction needs to be made clear in at least the referenced pages listed here. Pages 3.1-11, 4.0-1, 4.0-2, 4.0-4, 4.0-6, 4.0-7, and 4.0-8.	D26
3.1-2	3.1.2 Regulatory Framework – State and Federal Report inconsistency/unsupported conclusion - The Draft EIR indicates that "there are no applicable federal or state regulations." The Draft EIR refers	D-27

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to the fact that a majority of land within the existing and proposed TDPUD SOI is in National Forest; but neither in this section or elsewhere does it clearly separate public and private lands in the area calculations. This has the effect of overstating the potential impacts of these lands within the SOI. Federal ownership is covered for Sierra County (Table 3.1-1) but not made clear in the other jurisdictions. **D-27 cont.**

3.1-3 3.1.2 Local – Town of Truckee
Missing data - This section should include reference to the Town's SOI, not just the General Plan. **D-28**

3.1-9 3.1.3 Impacts and Mitigation Measures
Inconsistency with LAFCo Policy - This section states that, "The impact analysis below is based on CEQA Guidelines Appendix G thresholds of significance as adopted by Nevada LAFCo. These thresholds indicate that a project would have a significant impact if it would:

1) Physically divide an established community.

"The Initial Study prepared for the proposed project determined that the approval of either of the proposed SOIs would not place structures and/or land uses incompatible with existing land use or otherwise disrupt or divide the physical arrangement of an established community and would not conflict with an applicable land use plan"

The LAFCo preferred SOI would physically divide an established community in two different locations. Electric service in the Glenshire area of Truckee is currently provided by both TDPUD and Liberty Utilities. The TDPUD preferred electric SOI includes the area served by Liberty Utilities. The LAFCo recommended SOI excludes that portion of the Glenshire area served by Liberty Utilities and would thus physically divide the Glenshire area in terms of electric service. Therefore, the LAFCo recommended SOI would have a significant impact; however, the TDPUD preferred electric SOI would not have a significant impact. **D-29**

It is important to recognize that TDPUD was created in 1927 and the Town of was incorporated in 1993. Long before the incorporated municipality of Truckee existed, the Truckee community, including areas in Placer County immediately south of the boundaries of the Town of Truckee, existed and was provided water service by TDPUD. To this day, the Truckee community is recognized by residents, property owners and visitors to include areas beyond the Town of Truckee's boundaries. Unlike the TDPUD preferred water SOI, the LAFCo recommended SOI will physically divide the long **D-30**

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established greater Truckee community and result in a significant environmental impact.

According to the United States Postal Service, 96161, the recognized zip code for the Truckee area includes the Northstar area, east to the Nevada-California state line (except for the community of Floriston) and south to Olympic Valley. The Truckee area encompasses a much greater area than just the greater Truckee community. **D-30 cont.**

3.1-10 Impact 3.1.1

Inadequate analysis - Does not address consistency with the Town of Truckee SOI. **D-31**

3.1-11, 3.3-53, 4.0-5 Mitigation Measure 3.1.1

Inadequate analysis - This Mitigation Measure, which is used a number of times, is suspect in that action is required by other than the Lead Agency. This issue also arises with reference to the list of types of impacts that would become less than significant due to policies and procedures of the Town of Truckee and the affected counties. When the mitigation measure is outside of the control of the lead agency, the lead agency has to conclude that the impact is Significant and Unavoidable. Alternative wording for Mitigation Measure 3.1.1 is shown under page reference ES-3. **D-32**

3.1-12 Inconsistency with LAFCo Policy - Nevada LAFCo Sphere of Influence Policies "...spaces designated as open space will not be included." At the Nevada LAFCo Commission meeting of September 22, 2011, LAFCo legal counsel Scott Browne stated that it is reasonable for a Special District to annex parcels with facilities located on those same parcels. As the District receives the hydroelectric power from Stampede Reservoir Dam the open spaces from Stampede Reservoir Dam crossing through Russell Valley into the Hobart Mills area would/could contain District facilities. **D-33**

3.1-12 Cumulative Consistency

Inadequate analysis - The cumulative discussion fails to refer to local policies that might discourage inclusion of areas designated for open space or forest resources. The impact discussion should admit if there are policies discouraging growth in designated open space areas, however if major infrastructure passes through or near such areas it could encourage growth. **D-34**

3.2-10 Standards of Significance

Inadequate analysis - The Draft EIR utilizes standards of significance for the evaluation of the impacts from and development of mitigation measures for GHG emissions that were developed by the Bay Area Air Quality **D-35**

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Management District (BAAQMD). While Nevada LAFCo has discretion in determining appropriate standards of significance, that discretion is not unfettered. The CEQA Guidelines Section 15064.4 requires Nevada LAFCo to support its decision to use a particular model or methodology with substantial evidence and explain the limitations of the particular model or methodology selected. Nevada LAFCo has not done either.

D-35 cont.

The only reasons provided in the Draft EIR for utilization of the BAAQMD standards are because another agency, the Northern Sierra Air Quality Management District, considered them reasonable and appropriate for use in a couple of other EIRs. This does not constitute substantial evidence. Moreover, there is no explanation as to whether or why these standards, which were developed for the evaluation of impacts from and mitigation measures for GHG emissions in a coastal, sea-level, densely populated, urban area, are appropriate or would provide valuable information to evaluate such impacts in a mountainous, high altitude, sparsely populated, rural area. Nevada LAFCo must provide substantial evidence as to why the BAAQMD standard was selected and explain the limitations of this model.

D-36

3.2-11 Methodology

Erroneous application of standards - The Northern Sierra Air Quality Management District (NSAQMD) currently has no adopted threshold of significance for greenhouse gas emissions. The Bay Area Air Quality Management District (BAAQMD) thresholds were used in the analysis. The 6.6 MT/SP (metric tons of CO2e per service population) is more representative of the Truckee locale; rural and mountainous and is used for general and area plans. The 4.6 MT/SP is typically used for specific development projects. Further, there is neither discussion nor justification for the 4.6 MT/SP threshold. Selection of these criteria over the 6.6 MT/SP threshold is arbitrary.

D-37

3.2-21 Electric Service and Water Service

Lack of clarity - This needs to be retitled to Electric Service; there is no mention of Water Service anywhere within this section. It needs to be made clear that the Northstar area is to be included only within the Electric Service territory.

D-38

3.2-22 Report inconsistency - The greenhouse gas (GHG) analysis (page 3.2-22) does not use the same numbers as Table 3.3-4. The GHG analysis also fails to suggest a mitigation measure to concentrate development in the vicinity

D-39

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of existing development to reduce automobile dependence. As shown, the largest shares of GHG emissions are associated with mobile sources. **D-39 cont.**

The footnote of Table 3.2-11 states "Emission and intensity factor based on utility provider statewide average defaults due to lack of specific TDPUD factors in modeling software." Had the TDPUD been requested to provide information the use of the defaults would not have been necessary. **D-40**

3.2-23

Incorrect data - Table 3.2-12 identifies the most recently available electric energy demand information for both Liberty Utilities and the TDPUD as well as the current renewable energy mix for each utility company – this is not the most recent data available. Liberty Utilities data is from 2012 provided by Mr. Smart, TDPUD data is 2010; more current data was never requested of the TDPUD. See Exhibit 1, Letter to Michael D. Holley, TDPUD Available Electric Utility Data.

Corrected/recommended language - This is not the most recently available data; the consultant asked Mr. Smart of Liberty but did not contact TDPUD for data. This table should both contain 2012 data. The data required is given below and a re-write of this entire section is required. Liberty Utilities is an Investor Owned Utility (IOU, for profit) and is regulated by the CPUC. TDPUD is a Publicly Owned Utility (POU, owned by its customers) and is governed by an elected Board. **D-41**

Table 3.2-12
Total Electric Energy Demand and Renewable Energy Mix-
Liberty Utilities and Truckee Donner Public Utility District

Electric Service Provider	Total Energy Demand (Annual KWh)	Renewable Energy Mix Percentage	Renewable KWh Annually
Liberty Utilities	564,909,525 (1)	20.0% (3)	112,981,905
TDPUD	146,014,478 (2)	37.1% (4)	54,195,361

Sources: (1) CPUC 2012b; total energy demand is projected for Year 2013.
(2) Actual 2012 data presented to TDPUD Board at meeting of February 20, 2013. Hollabaugh
(3) Smart 2012
(4) Actual 2012 data presented to TDPUD Board at meeting of February 20, 2013. Hollabaugh

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As shown in **Table 3.2-12**, Liberty Utilities has a total energy demand of 564,909,525 kilowatt-hours annually, of which 20.0 percent is supplied from renewable energy sources. The TDPUD has a total energy demand of 146,014,478 kilowatt-hours annually, of which 37.1 percent is supplied from renewable energy sources.

As previously stated, the TDPUD proposes to expand its SOI. The expansion of TDPUD's electrical service area includes the lands within the District-preferred SOI which could potentially add an additional energy demand of 95,230,021 kilowatt-hours to the TDPUD's current energy demand of 146,014,478 kilowatt-hours annually, for a total annual energy demand of 241,244,499 kilowatt-hours. Such an immediate addition of energy demand would reduce the TDPUD's current renewable energy mix percentage to 22.5 percent. However, such a scenario is not likely because a majority of the lands within the proposed expansion area into the TDPUD SOI are currently not developed and are not anticipated to be fully development at any time in the intermediate future.

The Renewables Portfolio Standard program requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020. According to the CEC, the TDPUD is projected to sell 176,383,000 kilowatt-hours of electricity annually by the year 2020 and is expected to be able to deliver approximately 72,619,000 kilowatt hours of renewable energy annually by the year 2020 (CEC 2011). TDPUD has added renewable resources to its energy mix and forecasts to deliver 66,111,000 kilowatt hours of renewable energy in 2013 (Exhibit 1) or more than 40 percent renewable energy mix. Also, TDPUD is forecast to deliver 72,625,000 kilowatt hours of renewable resources in 2014 and 2015. TDPUD could, if required to, obtain at a minimum another 13,000,000 kilowatt-hours of renewable resources between 2015 and 2020. Therefore, the potential for the TDPUD to add the additional energy demand, under the District-preferred SOI boundary, of 95,230,021 kilowatt-hours to its projected 2020 energy demand would result in a TDPUD renewable energy mix of 34 percent (176,383,000 + 95,230,021 = 251,924,923. (72,625,000 + 13,000,000) /251,924,923 = 0.34), which is one percentage point above the mandated 33 percent or 2,519,249 kilowatt-hours of renewable energy, based on projections.

D-41 cont.

The purchase power contract involving Liberty Utilities' supply of electricity to its California customers guarantees the delivery of a specific and minimum verifiable amount of renewable energy (Smart 2012). The amount of guaranteed renewable energy for 2012 and 2013 is 20 percent (Smart 2012). The amount of renewable energy mix supplied to Liberty

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Utilities' California customers in 2014 is set at 21.7 percent, and in 2015 the renewable mix percentage is contractually set at 23.3 percent (Smart 2012). A new renewable energy mix requirements contract has yet to be established for years beyond 2015.

The CPUC implements and administers the Renewables Portfolio Standard program in collaboration and cooperation with the CEC and other agencies. The CPUC and the CEC monitor Renewables Portfolio Standard goals and results, including compliance reviews and enforcement, as necessary (CPUC 2011). The CPUC oversees the investor owned utilities (IOU's). The CPUC requires IOU's to prepare a renewable energy procurement plan and update that plan when necessary (CPUC 2011). The CPUC reviews Renewables Portfolio Standard procurement plans for each electric utility provider and accepts, rejects, or modifies the plans. Also, the CPUC oversees the electric utility providers' (IOU's) Renewable Portfolio Standard solicitations for renewable energy, reviews the results of solicitations submitted for approval by an electrical utility (IOU), and accepts or rejects proposed contracts based on consistency with the approved procurement plan. **D-41**

In addition, the Renewables Portfolio Standard program specifically excludes local publicly owned electric utilities (POU's) like TDPUD from the definition of "retail seller" (CEC 2008). Instead, local publicly owned electric utilities (POU's), such as TDPUD, are required to implement a Renewables Portfolio Standard but are given flexibility in developing utility-specific targets, timelines, and resource eligibility rules (CEC 2008). Therefore, a TDPUD renewable energy mix of 34 percent in the year 2020 does not necessarily represent a lack or excess of compliance with the Renewables Portfolio Standard program.

3.2-24

Unsupported conclusion - Climate Change and Greenhouse Gases
In discussing the Renewables Portfolio Standard ("RPS"), the Draft EIR states that, "Both Liberty Utilities and the TDPUD are expected to achieve the mandated requirements of the Renewables Portfolio Standard program regardless of their respective Spheres of influence due to CPUC and CEC oversight." It is fair and accurate to assume that TDPUD will achieve the target, because to date it is not only meeting, but it is exceeding, the RPS. The TDPUD has demonstrated the will and ability to exceed the established RPS standard, not only by establishing its own RPS that is higher than that specified by the State of California, but by significantly exceeding it. Therefore, it is a reasonable and fact based assumption that the TDPUD will continue to meet and exceed the State specified RPS. **D-42**

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On the other hand, the assumption that Liberty Utilities will achieve the mandated requirements of California's RPS program because of CPUC oversight is not reasonable or based in fact. Liberty Utilities does not now, nor has it ever, achieved California's mandated RPS. It has announced the need to increase its rates by more than 60% simply to meet the mandated RPS requirements. Such rate increases would be in additional to other rate increases being sought and likely to be sought in the near future by Liberty Utilities. See Exhibit 2, memo to Michael D. Holley, 10 Year Projection for Liberty Energy Customer Rates Increases vs. TDPUD Rate Increases.

Simply for the reason that Liberty Utilities is subject to CPUC oversight doesn't mean that it will be granted the severe rate hikes needed to meet the mandated RPS. The CPUC must balance the benefits and burdens not only to the utilities it regulates, but also to the people of California served by those utilities. It is quite possible that Liberty Utilities would not be granted the rate hikes in either the amounts requested or within the timeframe requested. If either of these were to occur, Liberty Utilities' carbon footprint would continue to dwarf the carbon footprint of the TDPUD.

D-42 cont.

The faulty and unsupported assumption that Liberty Utilities will achieve compliance with California's mandated RPS exposes yet another deficiency in the Draft EIR. It appears more likely that there would be significant environmental impacts under the LAFCo recommended SOI and not under the TDPUD preferred electric SOI due to the greenhouse gas emissions produced as a result of Liberty Utilities being the electric service provider.

3.3-1

Secondary Environmental Effects of the Project

Unsupported conclusion - The discussion and analysis in Section 3.3 of Draft EIR that compares the secondary environmental effects of the project for the LAFCo-recommended and TDPUD-preferred SOI scenarios is fatally flawed throughout for the simple reason that there has been absolutely zero data on the amount of growth that could occur in the areas that lie outside of the LAFCo-recommend SOI scenario but within the TDPUD-preferred electric and water SOI scenarios. The Draft EIR recognizes that growth can occur in those areas because electric and water services can be provide by other public water service providers and other private electric service providers. However, without any data it is impossible for the Draft EIR, and by extension Nevada LAFCo and the public, to understand or evaluate the potential impacts to the environment from the LAFCo-recommended and TDPUD-preferred SOI scenarios. Without such data and analysis, this entire section of the Draft EIR provides no valuable information or analysis to evaluate the potential environmental impact of the project.

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A. No Comparison of Potential Growth Inducing Impacts in the Area Outside of the LAFCo-Recommended SOI and the TDPUD-Preferred SOIs

In the discussion of the Growth Inducement Potential of the LAFCo-recommended SOI on Page 3.3-26 and with respect to Table 3.3-3, the Draft EIR states:

"Table 3.3-3 identifies the extent of growth potential in the LAFCo-recommended Sphere of Influence (near term and long term). The total development potential shown in **Table 3.3-3** does not factor existing development. It should be noted that some of this growth potential (rural development) could occur without the proposed update of the SOI given that electric and water service can also be provided through wells or the Placer County Water Agency (Placer County only) and electrical service can be provided by private company service providers."

Similarly, with respect to the discussion of the Growth Inducement Potential of the TDPUD-preferred SOI for electric service on Page 3.3-29 and with respect to Table 3.3-4, the Draft EIR states, "**Table 3.3-4** identifies the extent of growth potential in the TDPUD-preferred SOI for electrical service. The total development potential shown in **Table 3.3-4** does not factor existing development. It should be noted that some of this growth potential (rural development) could occur without the proposed update of the SOIs given that electric service could continue to be provided by Liberty Utilities."

D-44

Again, with respect to the discussion of the Growth Inducement Potential of the TDPUD-preferred SOI for water service on Page 3.3-34 and with respect to Table 3.3-5, the Draft EIR states:

"**Table 3.3-5** identifies the extent of growth potential in the TDPUD-preferred SOI for water service. The total development potential shown in **Table 3.3-5** does not factor existing development. It should be noted that some of this growth potential (rural development) could occur without the proposed update of the SOIs given that water service could be provided by wells and the Placer County Water Agency."

B. Discussion of the Secondary Effects

Throughout the discussion of the secondary effects, the Draft EIR draws the same general conclusions that: (1) the impacts for the LAFCo-recommended and TDPUD-preferred SOI scenarios would be considered significant and unavoidable; (2) the TDPUD-preferred scenarios would

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result in greater impacts than the LAFCo recommended SOI given the larger extent of development potential; and (3) the TDPUD-preferred SOI for electric service would have the greatest impact. A representative statement is made with respect to aesthetics. On Page 3.3-38 the Draft EIR states,

"Given the visual characteristics and minimally developed condition of the region, aesthetic impacts for the LAFCo recommended and TDPUD-preferred SOI scenarios would also be considered significant and unavoidable. The TDPUD-preferred scenarios would result in greater aesthetic impacts than the LAFCO-recommended SOI, given the larger extent of development potential. The TDPUD-preferred SOI for electric service would have the greatest impact."

Nearly identical verbiage is used throughout this secondary effects discussion for impacts to Air Quality (Page 3.3-40), Biological Resources (Page 3.3-41), Cultural and Paleontological Resources (Page 3.3-41), Geology and Soils (Page 3.3-42), Hazards (Page 3.3-43 and 3.3-44), Hydrology and Water Quality (Page 3.3-45), Land Use/Open Space (Page 3.3-46), Noise (Page 3.3-47), Population/Employment/Housing (Page 3.3-48), Public Services, Utilities and Recreation (Page 3.3-49) and Transportation and Circulation (Page 3.3-50).

D-45 cont.

The discussions of Population/Employment/Housing and Transportation and Circulation are particularly misleading. The discussion of Population/Employment/Housing notes the impressive looking facts that there could be an additional 13,069 dwelling units and 32,673 resident for the TDPUD-preferred SOI for electric service and an additional 7,658 dwelling units and 19,145 residents for the TDPUD-preferred SOI for water service over the LAFCo recommended SOI. (Page 3.3-48.) The discussion of Transportation and Circulation states that the LAFCo-recommended SOI area growth could generate approximately 10,000 daily trips at build out for residential, commercial and industrial uses combined, while the TDPUD-preferred SOI for electric service could generate 86,276 daily trips and the TDPUD-preferred SOI for water service could generate 86,536 daily trips. These numbers are simply hyped-up. The vast majority of the growth in residents, dwelling units and daily trips will occur even if there is no SOI update because they will occur in already developed and developing areas served by Liberty Utilities and the Placer County Water Agency.

C. Conclusion

Without specific information about how much growth could occur without the proposed SOI update, it is impossible to analyze, evaluate, disclose and

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Letter D Continued

compare the potential impacts of the various SOI scenarios. All the conclusions that the TDPUD-preferred scenarios would result in greater impacts given the larger extent of development potential, with the TDPUD-preferred SOI for electric services having the greatest impact are pure speculation. They are not based in fact or science. The discussion of the secondary effects is replete with meaningless statistics that appear only to be included in the Draft EIR to create the illusion that there would be significantly greater impacts under the TDPUD-preferred SOI scenarios. This entire discussion and analysis should be rejected by the LAFCo Commission. The Commission should direct its staff and consultant to return to the drawing board for the purposes of gathering meaningful data that can be used to properly evaluate the environmental impacts of the project. The absence of such data and analysis makes the Draft EIR and environmental review inadequate If Nevada LAFCo were to adopt a final EIR with such conclusions, it would be acting in an arbitrary and capricious manner because there is absolutely no factual support for these conclusions.

D-46 cont.

3.3-51

Restricting the SOI Boundary

Unsupported conclusion - The Draft EIR suggests that restricting the SOI boundary isn't practical and would result in inconsistencies with planned development by the affected land use agencies. However, there is no discussion of the planned areas of growth to back up this conclusion, and no copy of the General Plan maps. There is no basis for the conclusion that a reduction in the SOI boundaries would reduce economic growth, jobs, and housing. It is possible that the identified SOI boundaries would increase growth.

D-47

Once again, the emphasis in the Draft EIR is that the new SOI's would be the first step in a series of actions that support the identified planned growth. The first step (Town and County General and Specific Plans) has already been taken.

4.0-1

Alternative 1 - No Project Alternative

Inconsistency with CEQA - The No Project Alternative that LAFCo should review and evaluate is TDPUD's exiting SOIs. LAFCo's position that the "no project alternative" is "a coterminous sphere in which the agency sphere is the same as its jurisdictional boundary" is not consistent with CEQA. California Code of Regulations, Section 15126.6(e) (1) states in part,

"(1) The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of

D-48

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Letter D Continued

approving the proposed project with the impacts of not approving the proposed project."

Section 15126.6(e) (3) goes on to state,

"(3) A discussion of the "no project" alternative will usually proceed along one of two lines:

(A) When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan."

D-48 cont.

LAFCo's review and consideration of the District's SOI Plan Update constitutes a revision of an existing regulatory plan and thus would be covered by Section 15126.6(e)(3), above. Accordingly, the "no project alternative" would consist of comparing the projected impacts of LAFCo's preferred SOI to the impacts that would occur under the District's existing SOI.

The No Project Alternative is fatally flawed and results in the Draft EIR being inadequate because the No Project Alternative was not reviewed or evaluated as required by CEQA. Approval of a final EIR with this same analysis would be arbitrary and capricious and constitute an abuse of discretion.

4.0-3 No Project Alternative
Inconsistency with CEQA - No data is provided with respect to future development to justify the conclusion that the No Projective alternative will not conflict with applicable plans.

D-49

4.04 No Project Alternative – GHG Emissions and AB 32 Compliance
Unsupported conclusion - The analysis of the No Project Alternative suffers from the same flawed assumption that Liberty Utilities will achieve compliance with the State of California's mandated RPS because it is subject to CPCU oversight. (See discussion with respect to Page 3.2-24, above.)

D-50

4.0-11 Environmentally Superior Alternative
Inconsistency with CEQA - The text fails to identify the 'Environmentally Superior Alternative,' which is a CEQA requirement if the 'No Project Alternative' is identified as environmentally superior.

D-51

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Letter D Continued

Appendix 1.0	NOP/Initial Study/Comments	
Figure 1	Missing data - Does not accurately reflect the TDPUD's existing service territory within Placer County. See Placer LAFCo annexation November 14, 2012.	D-52
Figure 2	Missing data - Does not differentiate between Nevada LAFCo's recommended SOIs for either of the TDPUD's Electric Utility or Water Utility.	D-53
	Inconsistency with LAFCo Policy - Shows the entire existing TDPUD service territory as being within the so-called "Area of Concern"; this is inconsistent with Nevada LAFCo policy. Does not show any area of concern within Placer County; this is inconsistent with Nevada LAFCo policy. Per SR Jones, Executive Officer of Nevada LAFCo, public statement to the TDPUD Board of Directors on Wednesday, March 6, 2013, this omission was deliberate on the part of LAFCo staff as LAFCo staff is waiting on comments from Placer LAFCo regarding this issue. This deliberate omission on the part of LAFCo staff and LAFCo's consultant, Pacific Municipal Consultants (PMC), is inconsistent with the Area of Concern shown in the Nevada LAFCo Sphere of Influence Update for Truckee Sanitary District Draft Environmental Impact Report issued February 2013, Appendix 1, Figure 2 entitled LAFCo Recommended Sphere of Influence. By Executive Officer's own admission and disclosure to the TDPUD Board of Directors, this Draft EIR is incomplete and not ready for circulation, comment or adoption. Either the "area of concern" needs to be revised and re-evaluated or Nevada LAFCo must await comments from Placer LAFCo.	D-54

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Letter D Continued

EXHIBIT 1

Truckee Donner Public Utility District

Directors
Joseph R. Aguera
Jeff Bender
Bob Ellis
J. Ron Hemig
Tony Laliotis
General Manager
Michael D. Holley

March 15, 2013

Michael D. Holley
11570 Donner Pass Road
Truckee CA, 96161

Subject: TDPUD Available Electric Utility Data

A lot of data has been presented to the Board and been made available to the public. This memo summarized some of the data available.

System Description (2012): The 2012 system description (attached) contains a brief narrative of TDPUD electrical system including 2012;customer mix, load and demand, description of transmission service from NV Energy, geographic description and miles of distribution lines just to name a few.

Renewable Portfolio Standard (RPS) program results: Actual RPS results have been presented to the Board. The 2011 RPS actual were presented at the March 7, 2012 Board meeting while the 2012 RPS results were presented at the February 20, 2013 Board meeting. The total retail sales for 2011 and 2012 was 149,978,219 and 146, 014,478 kilowatt-hours respectively. The 2012 reduction in sales was mainly due to a mild weather in early 2012. TDPUD has added renewable resources in the past few years including the Horse Butte Wind project through Utah Associated Municipal Power Systems (UAMPS) of which TDPUD is a member. The Horse Butte Wind project started commercial operation on August 15, 2012. This project will add to our renewable energy serving our customers.

With the addition of Horse Butte Wind, I forecast to deliver 66,111,000 kilowatt-hours of renewable energy in 2013 or more than 40 percent renewable energy mix. TDPUD is forecast to deliver 72,625,000 kilowatt-hours of renewable energy in 2014 and 2015 through its long term renewable resources. If the TDPUD electric load were to grow substantially in the future, TDPUD has access to an additional 13,000,000 kilowatt-hours of renewable energy from other UAMPS members.

Below are tables that were presented to the Board:

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Letter D Continued

EXHIBIT 1

TDPUD 2011 Actual RPS (presented at March 7, 2012 Board meeting)

Eligible Renewables (CPUC)	MWh Sales	% Sales
Small Hydro	5,889	3.9%
Landfill Gas	19,639	13.1%
Wind	450	0.3%
REC's (Wind)	23,550	15.7%
Solar	0	0.0%
Totals	**49,528**	**33.0%**

TDPUD 2012 Actual RPS (presented at Feb 20, 2013 Board meeting)

Eligible Renewables (CPUC)	MWh Sales	% Sales
Small Hydro	2,970	2.0%
Landfill Gas	18,178	12.5%
Wind	15,047	10.0%
REC's (Wind)	18,000	12.3%
Solar	0	0.0%
Totals	**54,195**	**37.1%**

TDPUD is well positioned to meet our customer energy needs and meet the RPS targets that have been approved by our Board.

Sincerely,

Stephen Hollabaugh
Assistant General Manager
Truckee Donner Public Utility District

Enclosure (1)

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Letter D Continued

EXHIBIT 1

TRUCKEE DONNER
Public Utility District

System Description

Truckee Donner Public Utility District

Stephen Hollabaugh
Calendar Year 2012

Truckee Donner Public Utility District (Truckee Donner) is a public utility district of the state of California engaged in the distribution, sale and delivery of electric power and energy. The District is a transmission-dependent utility located high on the Eastern slope of the Sierra Nevada, within NV Energy's control area, and is not interconnected with any other utility. During the Fiscal Year ended December 31, 2012, the Electric System served 13,219 customers, comprised of 11,698 residential customers, and 1521 commercial and other customers. During such period, the Electric System supplied 146,014,478 kWh of energy and had a peak demand of 36,880 kW.

Truckee Donner is a network transmission service customer under the currently effective joint NV Energy OATT. Truckee uses this network service to import into and transport across NV Energy's grid all of the power necessary to serve Truckee's load. This load is served from four substations and one distribution interconnection with NV Energy. The substations and interconnection voltages are; Donner Lake Substation 60kV, Tahoe Donner Substation 60kV, Truckee Substation 60kV, Martis Valley Substation 120kV and Glenshire Recloser 14.4kV.

Truckee Donner electric service territory is comprised of approximately 44 square miles in eastern Nevada County and approximately 1.5 square miles in adjacent Placer County. The Electric System serves the vast majority of the service area of the District and has more than 218 miles of 12.47 kV and 14.4 kV distribution lines, including about 83 miles of underground distribution cables.

The number of employees in the electric department is thirty four (34). (Includes sum of shared employees' time in other district departments to determine equivalent full-time employees.)

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II-1

Letter D Continued

EXHIBIT 1

NUMBER OF ELECTRICAL CUSTOMERS AND TYPE OF LOAD SERVED

Truckee Donner Public Utility District
Calendar Year 2011

TYPE OF CUSTOMER	NUMBER OF CUSTOMERS DECEMBER 2012
Residential	11,698
Commercial	1,521
Industrial	0
Agricultural and Pumping	0
Military	0
Other	0
TOTAL	13,219

II-1

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Letter D Continued

EXHIBIT 2

Truckee Donner Public Utility District

Directors
Joseph R. Aguera
Jeff Bender
J. Ron Hemig
Tony Laliotis

General Manager
Michael D. Holley

Memo

To: Michael Holley
General Manager

From: Robert Mescher
Administrative Services Manager

Date: 07/05/2012

Re: 10-Year Projection for Liberty Energy Customer Rates Increases vs. TDPUD Rate Increases

---

Attachment 1 is a line graph projecting TDPUD and Liberty Energy (Liberty) customers' rate change from 2012 through 2021. By 2021, Liberty rates are projected to be 90% higher than they are today, whereas TDPUD rates are projected to be only 10% higher for the same 10-year period. In other words, a $100 utility bill today will be $190 for a Liberty customer for the same consumption, whereas, it will only be $110 for a TDPUD customer. Based on TDPUD's 10-year financial plan, the rates are projected to be far less than the projected rate of inflation, which is 3% per year. (See Attachment 2.)

Attachment 3 is a bar stacked graph illustrating the components of the projected increased Liberty rates.

- The first layer is a 10% increase, representing the pending 2012 Rate Case. (See Attachment 4.)
- The second layer represents another 11% increase to pay for the pending CalPECO Transmission Project (see Attachment 5), which TDPUD's *Electric Utility Manager* estimates will cost $48 million, plus a 10.5% ROI. The 10.5% ROI is described in the 2012 Rate Case.
- The top layer represents an increasing cost for renewable energy; "65% by 2020," as described by the General Manager of Liberty Energy, Mr. Bob Dodds, at the NCSD board meeting on December 21, 2011. (See Attachment 6.)

Attachment 7 is a stacked graph illustrating the impact on revenue per customer if TDPUD temporarily increased its rates to the same level of the projected Liberty Energy Rates referenced above.

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Letter D Continued

EXHIBIT 2

Today, TDPUD's annual average revenue per customer is $1,810. TDPUD's 10-year financial master plan projects the revenue per customer to increase 9% by 2020 to $1,979. Hypothetically, if the TDPUD customer rates were increased at the same level as the projected Liberty Rates, from 2016 through 2020, an additional $4,183 per customer would be collected over the five-year period. Assuming a 5% interest rate, that additional revenue could enable TDPUD to finance a project equal to $3,700 per customer over 5 years; or $3,300 over 10 years; or $2,650 over 20 years.

Attachment 8 is the table of data used for the graphs.

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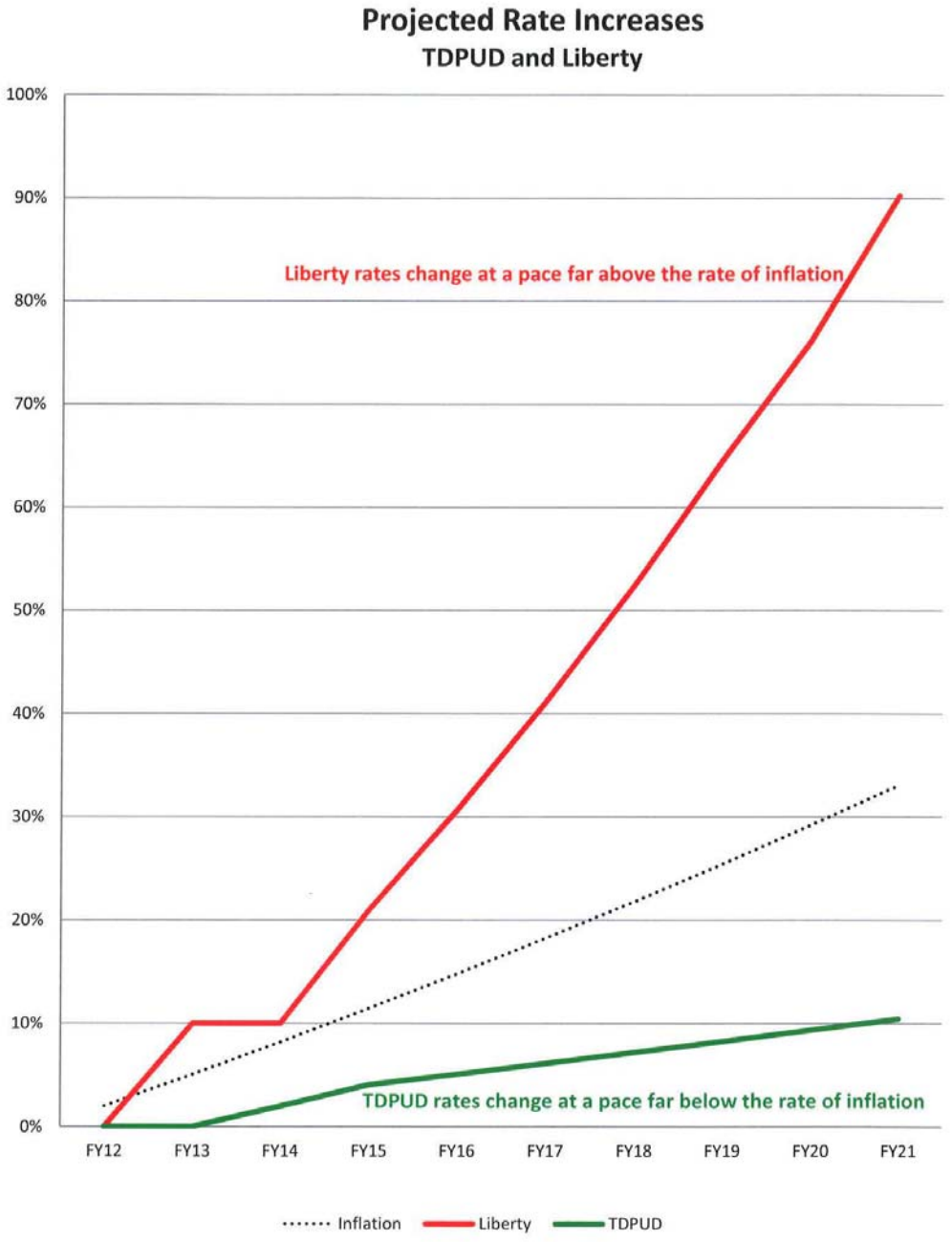
Letter D Continued

ATTACHMENT 1



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Letter D Continued

ATTACHMENT 2

Truckee Donner Public Utility District

Memo

To: Michael Holley
General Manager

From: Robert Mescher
Administrative Services Manager

Date: 03/27/2012

Re: Proposed Rates for Electric Utility Customers in the 10-Year Financial Master Plan

---

On November 2, 2011, as part of the FY12-FY13 Budget process, the Board reviewed and accepted the 10-Year Financial Plan. The key assumptions used in creating the Financial Master Plan were:

- 1% annual customer growth
- 2% annual inflation in 2012 and 3% thereafter
- No staffing changes
- No new debt
- Interest earnings 1% in FY14, 2% in FY15, 3% in FY16 through FY18, and 4% thereafter
- Increased cash and reserve goals for the Electric Utility to 180 days of annual expenditures

Also considered in the Financial Master Plan, are the various agreements that the District has entered with Utah Municipal Power System and NV Energy to ensure adequate power supply for the District through 2028. The District has already far exceeded the required 2020 Renewable Portfolio Standards (RPS) and is projected to continue to exceed those standards.

Despite the upward pressures on customer rates by inflation, increased reserves, and the RPS requirements, the proposed electric utility rates in the Financial Master Plan are projected to change at pace far below the inflation rate used in that financial model. The attachment shows that the electric utility rates, after the adjustment for inflation, are projected to decrease by 17% in today's dollars over the next 10 years.

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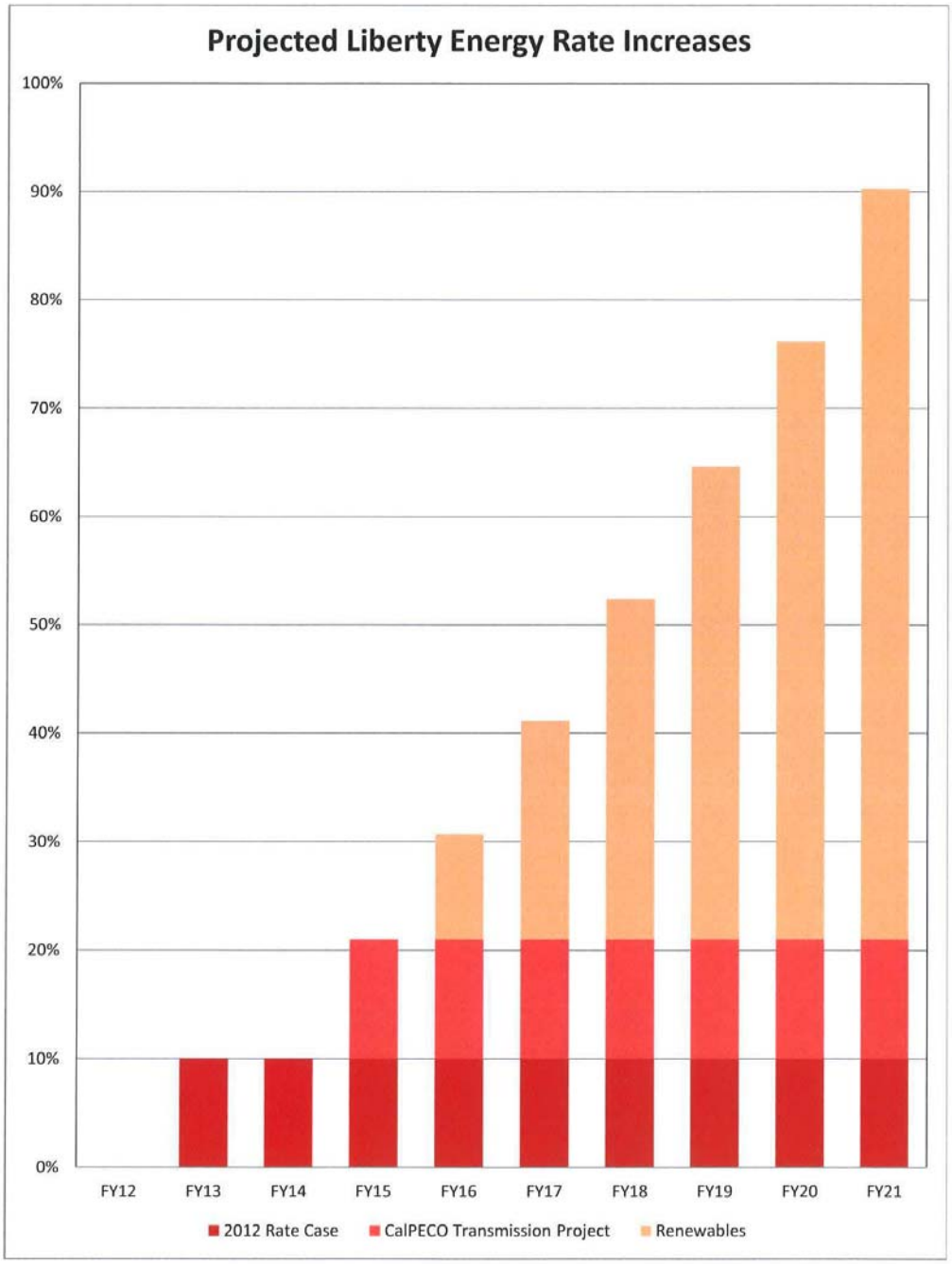
Letter D Continued

ATTACHMENT 3



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Letter D Continued

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

Application of California Pacific Electric Company LLC (U 933-E) for Authority to Among Other Things, Increase Its Authorized Revenues For Electric Service, Update Its Energy Cost Adjustment Clause Billing Factors, Establish Marginal Costs, Allocate Revenues, And Design Rates, as of January 1, 2013.	Application No. 12-02-014 (Filed February 17, 2012)

Amendment

to the

General Rate Case

Phase One

Volume 2 of 3

Exhibit 1 – Summary

Exhibit 2 – Results of Operations

FOR THE FORECASTED TWELVE MONTHS
ENDING DECEMBER 31, 2013

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Letter D Continued

California Pacific Electric Company, LLC
General Rate Case
Prefiled Direct Testimony

Exhibit 1 – Summary of CalPeco's General Rate Case
Chapter 1 – Policy Overview (Michael R. Smart)

able to leverage the experience gained through helping to guide public utilities in a variety of jurisdictions and industries.

At Liberty Utilities, we also aim to build positive relationships with our regulators. We aim to build trust and credibility through transparent and frequent communications. CalPeco has thus engaged in frequent meetings with both the Energy Division and the Division of Ratepayer Advocates and reported to each on important events within our service territory and relating to our transition into a locally-focused California-only utility. Furthermore, we seek to devise and utilize regulatory mechanisms that provide regulators, suppliers, and customers with more transparency and which better align utility financial incentives with public policy goals. To that end, CalPeco is proposing changes to its Energy Cost Adjustment Clause mechanism in Exhibit 2, Chapter 2 and to its Post-Test Year Adjustment Mechanism in Exhibit 5, Chapter 1. We will be requesting that a Base Revenue Requirement Adjustment Mechanism be reinstated to the California service territory in Exhibit 5, Chapter 2.

IV. CALPECO'S GENERAL RATE CASE APPLICATION

A. Overview

CalPeco is committed to providing a high quality of customer service, reliability, and safety. The location, climate and terrain of its California service territory pose special challenges and sometimes require relatively greater expenditures to achieve these objectives.

Exhibit 1
1-8

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Letter D Continued

California Pacific Electric Company, LLC
General Rate Case
Prefiled Direct Testimony

Exhibit 1 – Summary of CalPeco's General Rate Case
Chapter 1 – Policy Overview (Michael R. Smart)

This application requests an overall increase to customers over currently effective rates of $7.501 million annually or 10.02% to be effective on January 1, 2013.[3] As explained above, CalPeco proposes that its proposed increase of $12.933 million in general rates be offset by CalPeco's request to reduce ECAC rates annually by $8.728 million. In addition, CalPeco is proposing an additional $3.296 million line item for vegetation management, which is described below.

The main contributors to the overall increase are:

- Necessary investments in new and upgraded distribution facilities. Sierra made a substantial portion of these investments prior to its disposition of the California Utility; CalPeco has made additional investments after the disposition of the utility. The total increase in gross plant due to investments by both Sierra and CalPeco since Sierra was last able to include costs related to new investments in its rate base as part of its last general rate case is $42.2 million. Had Sierra remained the utility with service obligations for this service territory, it would have similarly requested inclusion of these costs into its California rate base.
- A decrease in the proposed Rate of Return to 10.5 % from the 10.75% which the Commission authorized for Sierra in D.09-10-041 ("Sierra 2008 Rate Case Decision");

[3] CalPeco currently has pending requests to increase rates in Application 11-06-020 and Application 11-11-013. Assuming these requests are authorized prior to the effective date of the rate increases being requested in this application, the total amount of the increase requested in this application will vary from the rates then in effect and will be reduced accordingly.

Exhibit 1
1-9

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Letter D Continued

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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In the Matter of the Application of CALIFORNIA PACIFIC ELECTRIC COMPANY, LLC (U933-E) for a Permit to Construct Electrical Facilities with Voltages between 50kV and 200kV: The 625 and 650 Line Upgrade Project	Application 10-08-024 (Filed August 31, 2010)

CALIFORNIA PACIFIC ELECTRIC COMPANY, LLC (U933-E) AMENDMENT TO THE SIERRA PACIFIC POWER COMPANY (U903-E) APPLICATION FOR A PERMIT TO CONSTRUCT ELECTRICAL FACILITIES WITH VOLTAGES BETWEEN 50kV AND 200kV: THE 625 AND 650 LINE UPGRADE PROJECT

Steven F. Greenwald
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Telephone: (415) 276-6500
Facsimile: (415) 276-6599
Email: stevegreenwald@dwt.com

Attorneys for California Pacific Electric Company, LLC

Dated: September 30, 2011

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Letter D Continued

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of CALIFORNIA PACIFIC ELECTRIC COMPANY, LLC (U933-E) for a Permit to Construct Electrical Facilities with Voltages between 50kV and 200kV: The 625 and 650 Line Upgrade Project	Application 10-08-024 (Filed August 31, 2010)

CALIFORNIA PACIFIC ELECTRIC COMPANY, LLC (U933-E) AMENDMENT TO THE SIERRA PACIFIC POWER COMPANY (U903-E) APPLICATION FOR A PERMIT TO CONSTRUCT ELECTRICAL FACILITIES WITH VOLTAGES BETWEEN 50kV AND 200kV: THE 625 AND 650 LINE UPGRADE PROJECT

I. INTRODUCTION

Pursuant to Rule 1.12 of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure ("Rules"), California Pacific Electric Company, LLC (U933-E) ("CalPeco")[1] respectfully submits this amendment ("CalPeco Amendment") to Application ("A.") 10-08-024 ("Sierra Application"). Sierra Pacific Power Company ("Sierra") filed the Sierra Application pursuant to General Order 131-D ("GO 131D") seeking to obtain a Permit to Construct ("PTC") the 625 and 650 Line Upgrade Project ("the Project").

In Decision ("D.") 10-10-017, the Commission approved the transfer of Sierra's California electric distribution facilities in the North Lake Tahoe area and the Kings Beach Generation Station to CalPeco. CalPeco acquired ownership of Sierra's former California assets and began providing utility service throughout its California service territory as of January 1, 2011. As the utility now charged with the obligation to provide reliable service to electric consumers resident in its newly-acquired service territory, CalPeco has succeeded Sierra as the proponent of this Project.[2] The CalPeco Amendment accordingly requests formal substitution of

[1] CalPeco also does business in California as "Liberty Energy - California Pacific Electric Company."
[2] The caption on the Sierra Application named Sierra, not CalPeco. Chief Administrative Law Judge Clopton issued a ruling on February 28, 2011 revising the caption to reflect CalPeco's ownership.

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Letter D Continued

CalPeco for Sierra as the proponent of both the Sierra Application and the Proponent's Environmental Amendment ("PEA").

The CalPeco Amendment also requests that the Commission grant CalPeco the necessary authorities to proceed with construction and operation of the Project. Specifically, the CalPeco Amendment requests that the Commission authorize CalPeco to construct the Project in three chronologically-distinct phases and in accordance with the revised Project schedule, all of which will be described further below.

II. CALPECO PROPOSES TO CONSTRUCT THE PROJECT ORIGINALLY PROPOSED BY SIERRA IN THREE PHASES

Sierra explained the purpose of the Project:

> The purpose of the Project is to maintain a safe and reliable transmission system for the North Lake Tahoe area, while accommodating current and projected future [load] growth. Presently, the North Lake Tahoe transmission system does not have single-contingency reliability; therefore, if one of several critical lines is lost during an intense storm event, a severe power outage could occur. Currently, the 625 Line experiences the most outages in the North Lake Tahoe transmission system due to snow loading and downed trees .... Single-contingency reliability can be achieved by upgrading the 625 Line and the 650 Line to 120-kV conductors and insulators.[3]

CalPeco is now the utility responsible for ensuring the safety and reliability of the transmission system in its service territory. CalPeco intends to pursue the scope of the Project as proposed by Sierra. However, as will be explained, based on the updated system data, load forecasting, and environmental constraints, CalPeco is proposing to construct the Project in three distinct chronological, but integrated, phases.

[3] Sierra Application at 3-4.

Letter D Continued

N·C·S·D
Northstar Community Services District
908 Northstar Drive, Northstar, CA 96161
P: 530.562.0747 • F: 530.562.1505 • www.northstarcsd.com

Board of Directors
Duane Evans
Jeann Green
Nancy Ives
Mike Moll
Frank Seelig

General Manager
Michael Staudenmayer

MINUTES OF THE REGULAR MEETING
OF THE BOARD OF DIRECTORS
DECEMBER 21, 2011 – 9:00 A.M.
NORTHSTAR FIRE STATION

President Evans called the meeting to order at 9:03 a.m. Wednesday, December 21, 2011. Roll call and Pledge of Allegiance followed.

DIRECTORS PRESENT:	**Evans, Green, Ives, Moll**
DIRECTORS ABSENT:	**Seelig**
STAFF PRESENT:	**Bowling, Lewis, Martin, Rector, Ryan, Shadowens, Staudenmayer**
OTHERS PRESENT:	**Mark Atlas, Mike Milliken, Andrew Strain, Bob Dodds, Rick Madrid, Phil Carrillo, David Becker, Andrew Ryan**

PUBLIC COMMENT
There was no public comment.

CONSENT CALENDAR

Director Green moved to approve the following consent calendar items:

- November 15, 2011 Finance Committee Meeting Minutes.
- November 16, 2011 Regular Board Meeting Minutes.
- December 13, 2011 Special Meeting Minutes.

Director Ives seconded, roll call was taken, Director Seelig absent; motion carried.

RECURRING BUSINESS

MEETINGS ATTENDED BY NCSD BOARD MEMBERS
There were no special meeting updates provided at this time.

EAST WEST PARTNERS – UPDATE
There was no East West update.

NPOA UPDATE
There was no NPOA update.

Agenda items were taken out of order.

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Letter D Continued

NEW BUSINESS

BOARD OF DIRECTORS – APPOINTMENT OF 2012 OFFICERS

Director Evans moved to nominate Nancy Ives as President of the Northstar Community Services District Board of Directors. Director Green seconded, roll call was taken, Director Seelig absent, motion carried.

Director Evans moved to nominate Frank Seelig as Vice-President of the Northstar Community Services District Board of Directors. Director Ives moved to nominate Mike Moll as Vice-President of the Northstar Community Services District Board of Directors. A roll call vote was taken, Director Seelig absent, Director Moll received the unanimous vote; motion carried.

Director Ives moved to nominate Jeann Green as the Financial Representative of the Northstar Community Services District Board of Directors. Director Moll seconded, roll call was taken, Director Seelig absent, motion carried.

APPROVAL OF CONSULTANT AGREEMENT – VEHICLE AND EQUIPMENT PARKING BAYS

General Manager (GM) Staudenmayer led a brief discussion of the desire to protect expensive and vital District rolling stock from the elements with some sort of covered parking at the Corporate Yard. This Agreement will provide the Board with construction options, budgets and engineer's estimates.

Director Ives moved to approve the Consultant Agreement for Vehicle and Equipment Parking Bays. Director Green seconded, roll call was taken, Seelig absent; motion carried.

APPROVAL OF ADDITIONAL SERVICES ADDENDUM FOR ON-CALL SPECIAL INSPECTION AND TESTING SERVICES FOR THE 2011 NORTHSTAR DRIVE RECONSTRUCTION PROJECT

District Engineer (DE) Martin provided a review of the extra services provided by Construction Materials Engineers during the 2011 Northstar Drive Reconstruction Project.

Director Ives moved to approve the Additional Services Addendum for On-Call Special Inspection and Testing Services for the 2011 Northstar Drive Reconstruction Project. Director Moll seconded, roll call was taken, Director Seelig absent; motion carried.

APPROVAL OF AMENDMENT 3 TO THE CONTRACT BETWEEN NORTHSTAR COMMUNITY SERVICES DISTRICT AND PLACER COUNTY WATER AGENCY FOR THE OPERATION AND MAINTENANCE OF THE ZONE 4 WATER SYSTEM

DE Martin provided a review of the work being done in Zone 4 under this Contract. Labor rates are being increased for Year 4 to include staff's cost of living increases.

Director Moll moved to approve Amendment 3 to the Contract between Northstar Community Services District and Placer County Water Agency for the Operation and Maintenance of the Zone 4 Water System. Director Green seconded, roll call was taken, Director Seelig absent, motion carried.

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Letter D Continued

APPROVAL OF CONSULTANT AGREEMENT – TH-1 WELL DESIGN
DE Martin reviewed the proposed Consultant Agreement for the TH-1 Well Design. Director Ives requested that when this project gets to the contract design stage it includes Kathy Welch's assistance, to avoid the inclusion of non-indigenous plants with the revegetation seed mix.

> **Director Moll moved to approve the Consultant Agreement, TH-1 Well Design with a Not to Exceed amount of $83,000.00. Director Green seconded, roll call was taken, Director Seelig absent, motion carried.**

ATTORNEY'S REPORT
Legal Counsel Atlas advised the Board that, per the Brown Act, directors' participation in regular or special meetings from a remote location by teleconference must be included on the Agenda prepared for that meeting. A maximum of two Board members may attend remotely, provided three members are in attendance at locations within the District's boundaries. The Agenda must also include the address of the remote location and be posted at the remote location at the same time prior to the meeting as the agenda is posted at the District office.

9:43 A.M. CLOSED SESSION
The Board adjourned to closed session pursuant to the following agenda items:

> A. Conference with Legal Counsel – Existing Litigation (California Government Code Section 54956.9(a)):
>
> 1) Name of Case: *Community Facilities District #1 of the Northstar Community Services District vs. Highlands Hotel Residences Company, LLC, Bank of America, et al*, Placer County, California Superior Court #SCV0027907.
>
> 2) Name of Case: *Douglas R. Wilson, solely as Receiver appointed in Placer County Superior Court Action No. S-CV-0028021 concerning real and personal property pledged by Highlands Hotel Residences Company, LLC, a Delaware limited liability company vs. NCSD & Community Facilities District No. 1 of NCSD*, Placer County, California Superior Court #SCV0029412.
>
> 3) Name of Case: *Truckee(CA) – Highlands Syndicated Holdings, LLC vs. Northstar CSD & Community Facilities District No. 1 of the Northstar CSD*, Placer County, California Superior Court #SCV0030117

B. Conference with Legal Counsel --- Anticipated Litigation (California Government Code Section 54956.9(b)) – Five cases. The anticipated cases are Mello Roos tax delinquency foreclosures. The names of the potential party defendants are 1311 Iron Horse LLC (2 parcels), Anita Youngblood, Jason & Ana Liza Browne, John Foster and NHJV Tahoe Phase 1 Gp. The Assessor's parcel numbers and delinquent tax amounts are set forth in the Board's Resolution 11-24, adopted September 21, 2011.

10:04 A.M. REGULAR MEETING RESUMED
Director Evans reported that no action was taken in Closed Session.

DIRECTOR REPORTS
There were no Director reports provided at this time.

10:26 A.M. RECESS – 10:29 A.M. REGULAR MEETING RESUMED

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Letter D Continued

OPERATIONS REPORT, MANAGEMENT – STAUDENMAYER
GM Staudenmayer provided a brief review of the items presented in his Operations Report.

10:30 A.M. LIBERTY ENERGY PRESENTATION
Bob Dodds, Rick Madrid and Phil Carrillo from Liberty Energy provided a PowerPoint presentation including company background, supply area, company goals and overview of a 3- to 9-year local electrical line upgrade project that will provide larger capacity and more reliable power to our area. Liberty Energy's programs provide free residential energy audits, education and outreach and a refrigerator recycling program. Mr. Dodds stated that the company will be increasing consumer electrical commodity charges 65% by 2020 in order to meet state mandated renewable portfolio standards.

VAIL UPDATE
Andrew Strain thanked those present at the meeting for attending yesterday's grand opening ceremonies at the new Zephyr Lodge. Vail's Operating Budget planning sessions will begin shortly; for consideration of Roundabout funding, he reminded the Board and District staff to take part in these planning sessions.

11:28 A.M. BREAK – 11:29 A.M. REGULAR MEETING RESUMED

ADOPTION OF 2010/2011 FINAL AUDIT
David Becker of James Marta and Company, CPAs, the external auditing firm hired by the District, presented the District's audited financials for fiscal year ending June 30, 2011. He provided a PowerPoint presentation of the District's financial history and the current position of the District. The District received an unqualified audit opinion, which is the most frequent type and is given when, in the opinion of the auditor, the financial statements give a true and fair view (or present fairly, in all material respects) and are prepared in accordance with the applicable financial reporting framework.

11:57 A.M. LUNCH RECESS – 12:07 P.M. REGULAR MEETING RESUMED

ADOPTION OF 2010/2011 FINAL AUDIT – CONTINUED

> **Director Green moved to adopt Resolution 11-29, 2010-2011 Fiscal Year Audit. Director Ives seconded, roll call was taken, Director Seelig absent, motion carried.**

OPERATIONS REPORT, FIRE – SHADOWENS
Chief Shadowens reported that Placer County CEO Tom Miller will be retiring in January, 2012.

Mr. Atlas left the meeting at 12:15pm.

PUBLIC WORKS REPORT – MARTIN/RYAN
DE Martin reported that the new well will meet or exceed expectations. Tentative reports show it has the capacity to provide 800 gallons per minute and water quality meets or exceeds all regulated requirements. Utilities Operations Manager Matt Ryan provided the following report:

- One loader that the District normally leases has not arrived yet, but because of the current weather, District operations will not be affected for now.
- Mailbox Site: The roof structure is complete and is being sandblasted. Sierra Crane has been scheduled to deliver the structure to the site. Traffic control will be in place during the delivery process and for public safety reasons the mailbox site will be closed to the public while the roof is installed. The closure is anticipated to be for one day.

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Letter D Continued

APPROVAL OF THE WARRANT REGISTER
Controller Lewis reviewed the warrant register.

Director Moll moved to approve the warrant register in the amount of $3,908,067.74. Director Ives seconded, roll call was taken, Director Seelig absent, motion carried.

ADJOURNMENT:
The meeting adjourned at 12:49 p.m.

Respectfully submitted,

Duane Evans, President of the Board

James Bowling, Secretary of the Board

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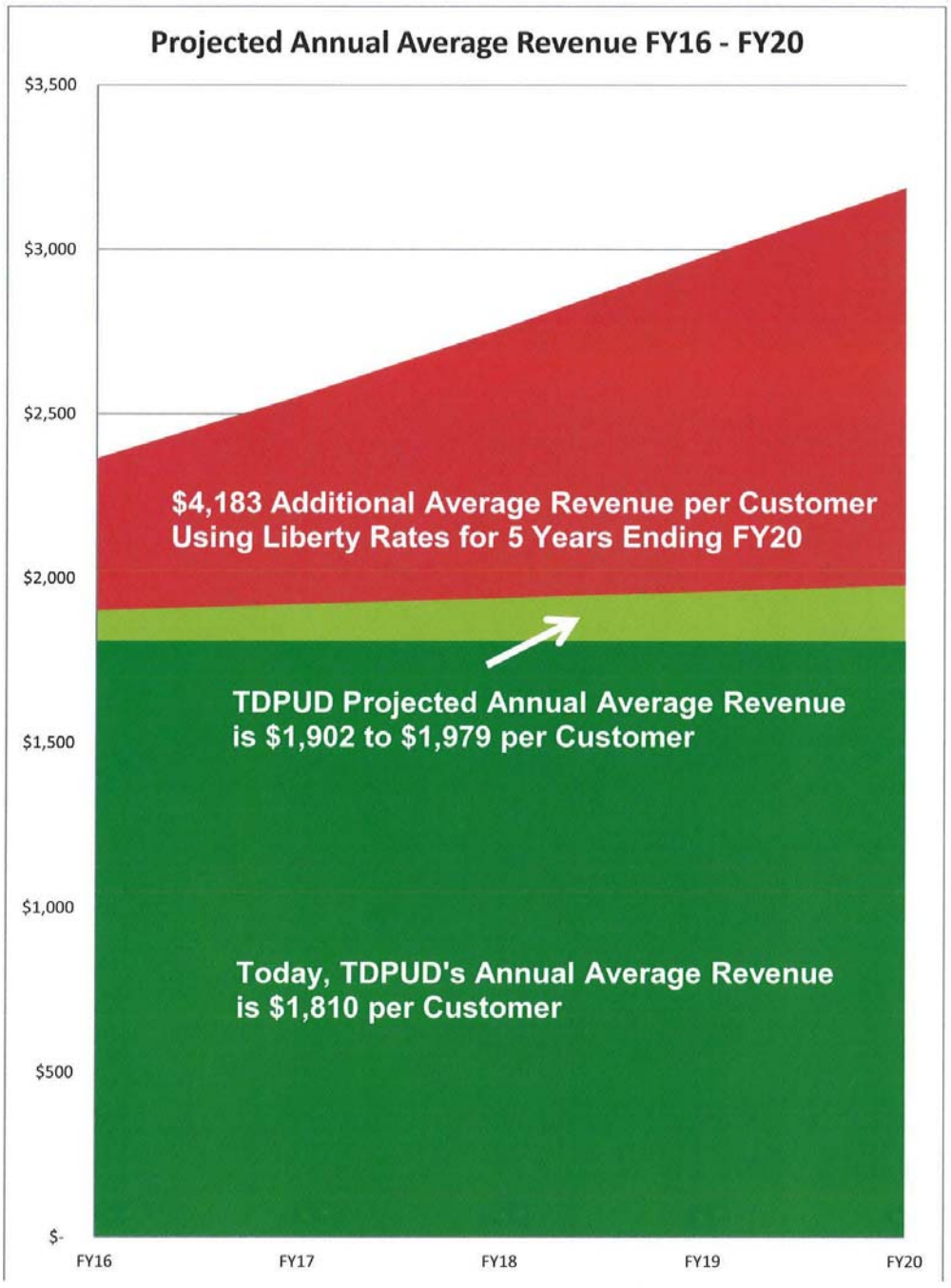
Letter D Continued

ATTACHMENT 7



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Letter D Continued

ATTACHMENT 8

Truckee Donner Public Utility District
Projected Electric Utility Rate Changes and Inflation
FY12 - FY21

	FY12	FY13	FY14	FY15	FY16	FY17	FY18	FY19	FY20	FY21
Proposed electric utility rate change	0%	0%	2%	2%	1%	1%	1%	1%	1%	1%
Cumulative rate change	0%	0%	2%	4%	5%	6%	7%	8%	9%	10%
Rate Index	100	100	102	104	105	106	107	108	109	110
Compounded rate change	0%	0%	2%	4%	5%	6%	7%	8%	9%	10%
Projected inflation	2%	3%	3%	3%	3%	3%	3%	3%	3%	3%
Cumulative inflation	2%	5%	8%	11%	14%	17%	20%	23%	26%	29%
Inflation Index	102	105	108	111	115	118	122	125	129	133
Compounded inflation	2%	5%	8%	11%	15%	18%	22%	25%	29%	33%
Adjusted rate change (rate change, less inflation)	-2%	-3%	-1%	-1%	-2%	-2%	-2%	-2%	-2%	-2%
Cumulative adjusted rate change	-2%	-5%	-6%	-7%	-9%	-11%	-13%	-15%	-17%	-19%
Adjusted Rate Index	98	95	94	93	91	89	88	86	84	83
Compounded adjusted rate change	-2%	-5%	-6%	-7%	-9%	-11%	-12%	-14%	-16%	-17%
Estimated Revenue	$ 23.9	$ 23.9	$ 24.3	$ 24.8	$ 25.1	$ 25.3	$ 25.6	$ 25.8	$ 26.1	$ 26.4
Estimated Revenue @ Liberty Rate Increase	$ 23.9	$ 26.2	$ 26.2	$ 28.9	$ 31.2	$ 33.7	$ 36.4	$ 39.3	$ 42.0	$ 45.4
Delta Revenue	$ -	$ 2.4	$ 1.9	$ 4.0	$ 6.1	$ 8.4	$ 10.8	$ 13.4	$ 15.9	$ 19.0
TDPUD Current Customers	13,185	13,185	13,185	13,185	13,185	13,185	13,185	13,185	13,185	13,185
Today's TDPUD Revenue per Customer	$1,810	$1,810	$1,810	$1,810	$1,810	$1,810	$1,810	$1,810	$1,810	$1,810
Estimated Increased TDPUD Revenue per Customer	$ -	$ -	$ 36	$ 73	$ 92	$ 111	$ 130	$ 149	$ 169	$ 189
Estimated TDPUD Revenue per Customer	$1,810	$1,810	$1,846	$1,883	$1,902	$1,921	$1,940	$1,959	$1,979	$1,999
Estimated Revenue per Customer @ Liberty Rate Incr	$1,810	$1,991	$1,991	$2,190	$2,365	$2,554	$2,758	$2,979	$3,188	$3,443
Delta Revenue per Customer	$ -	$ 181	$ 145	$ 307	$ 463	$ 633	$ 818	$1,020	$1,209	$1,444
Cumulative Delta Revenue per Customer (Start FY16)					$ 463	$1,096	$1,914	$2,934	$4,143	$5,587

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Letter D Continued

ATTACHMENT 8

Liberty Energy
Projected Electric Utility Rate Changes and Inflation
FY12 - FY21

	FY12	FY13	FY14	FY15	FY16	FY17	FY18	FY19	FY20	FY21
Estimated revenue ($ millions)	75	83	83	91	98	106	114	123	132	143
Existing rate case		10%								
New rate case for 33% renewables by 2020					8%	8%	8%	8%	7%	8%
CalPECO 625 & 650 Elec Line Upgrade Phase 1-3 $46M				10%						
Rate change	0%	10%	0%	10%	8%	8%	8%	8%	7%	8%
Cumulative rate change	0%	10%	10%	20%	28%	36%	44%	52%	59%	67%
Rate Index	100	110	110	121	131	141	152	165	176	190
Compounded rate change	0%	10%	10%	21%	31%	41%	52%	65%	76%	90%
Projected inflation	2%	3%	3%	3%	3%	3%	3%	3%	3%	3%
Cumulative inflation	2%	5%	8%	11%	14%	17%	20%	23%	26%	29%
Inflation Index	102	105	108	111	115	118	122	125	129	133
Compounded inflation	2%	5%	8%	11%	15%	18%	22%	25%	29%	33%
Adjusted rate change (rate change, less inflation)	-2%	7%	-3%	7%	5%	5%	5%	5%	4%	5%
Cumulative adjusted rate change	-2%	5%	2%	9%	14%	19%	24%	29%	33%	38%
Adjusted Rate Index	98	105	102	109	114	120	126	132	138	144
Compounded adjusted rate change	-2%	5%	2%	9%	14%	20%	26%	32%	38%	44%

	FY12	FY13	FY14	FY15	FY16	FY17	FY18	FY19	FY20	FY21
2012 Rate Case	0%	10%	10%	10%	10%	10%	10%	10%	10%	10%
Renewables	0%	0%	0%	0%	8%	16%	24%	32%	39%	47%
CalPECO Project	0%	0%	0%	10%	10%	10%	10%	10%	10%	10%
Cumulative rate change	0%	10%	10%	20%	28%	36%	44%	52%	59%	67%
Revenue Increase										
2012 Rate Case	-	8	-	-	-	-	-	-	-	-
Renewables	-	-	-	-	7	8	8	9	9	11
CalPECO Project	-	-	-	8	-	-	-	-	-	-
Total Revenue increase	-	8	-	8	7	8	8	9	9	11
Estimated revenue ($ millions)	75	83	83	91	98	106	114	123	132	143

	FY12	FY13	FY14	FY15	FY16	FY17	FY18	FY19	FY20	FY21
2012 Rate Case	-	10%	10%	10%	10%	10%	10%	10%	10%	10%
Renewables	-	0%	0%	0%	10%	20%	31%	44%	55%	69%
CalPECO Transmission Project	-	0%	0%	11%	11%	11%	11%	11%	11%	11%
Compounded rate change	0%	10%	10%	21%	31%	41%	52%	65%	76%	90%

ASSUMPTIONS

10% Existing 2012 Rate Case
Renewables } 65% increase from 2011
CalPECO I = CalPECO 625 and 650 Electric Line Upgrade Project Phase 1 ($16 million) 2015 - 2016
CalPECO II = CalPECO 625 and 650 Electric Line Upgrade Project Phase 2 ($12 million) 2017 - 2018
CalPECO III = CalPECO 625 and 650 Electric Line Upgrade Project Phase 3 ($18 million) 2019 - 2020

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Letter D Continued

EXHIBIT 3

N·C·S·D
Northstar Community Services District
908 Northstar Drive, Northstar, CA 96161
P: 530.562.0747 • F: 530.562.1505 • www.northstarcsd.com

Board of Directors
Duane Evans
Jeann Green
Nancy Ives
Mike Moli
Frank Seelig

General Manager
Michael Staudenmayer

August 30, 2011

Nevada County LAFCO
SR Jones, Executive Officer

RE: Truckee Donner Public Utility District Sphere of Influence Plan Update – Electric Service

The Northstar Community Services District (NCSD) has had the opportunity to learn more about the issue of electric service in the region and has the following comments on the Public Review Draft of the Sphere of Influence Plan Update for the Truckee Donner Public Utility District (TDPUD) Dated May 10, 2011 and the "Request for Sphere of Influence Update" dated June 14, 2011 provided by the TDPUD.

The NCSD supports the TDPUD's proposal to expand the electric sphere of influence in the Northstar area of Placer County currently being served by Liberty Energy. The District believes that including the Northstar area within the TDPUD's electric SOI is appropriate and will help ensure that our constituents are presented with options in the locally dynamic business of electric service. Affording a local Public Owned Utility the opportunity to be a viable option for providing electric service to the Northstar area is essential to a healthy marketplace with stable, competitive rates and local control. Since the NCSD does not provide electric service within its boundaries, there is no incompatibility between TDPUD's proposal and the NCSD's public services.

The Nevada LAFCO's proposal to reduce the TDPUD's electric SOI to the Town of Truckee's boundary provides no benefits to the region and has the potential to destabilize the future electric service to our constituents. The NCSD objects to this proposal and urges the Commission to reconsider the electric SOI for the TDPUD.

Sincerely,

Mike Staudenmayer
General Manager

Cc: Kristina Berry, Placer County LAFCO
Michael Holley, TDPUD
Tom Miller, Placer County

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Letter D Continued

EXHIBIT 4

northstar property owners association

September 8, 2011

Nevada County LAFCO
SR Jones, Executive Director

Dear SR Jones,

The Northstar Property Owners Association (NPOA) which consists of 1,480 properties has recently been informed about the issue of electric service in the region and the Public Review Draft of the Sphere of Influence Plan Update for the Truckee Donner Public Utility District (TDPUD) dated May 10, 2011 and the "Request for Sphere of Influence Update" dated June 14, 2011 provided by the TDPUD.

NPOA agrees with the comments previously submitted by the Northstar Community Service District, dated August 30, 2011. The inclusion of the Northstar area in the SOI is not only appropriate it will definitely ensure our membership the opportunity to be represented locally with the best option for electric rates.

The Nevada LAFCO's proposal to reduce the TDPUD's electric SOI to the Town of Truckee's boundary provides no benefits to our community and has the potential to negatively affect the electric service to our membership. NPOA urges the Commission to reconsider the electric SOI for the TDPUD.

At the Direction of the Board of Directors,

Geoff Sullivan Stephens
General Manager

Cc: Mike Staudenmeyer
Kristina Berry, Placer County LAFCO
Michael Holley, TDPUD
Tom Miller

2200 NORTH VILLAGE LANE • TRUCKEE, CALIFORNIA 96161 • TELEPHONE (530) 562-0322
FAX (530) 562-0324 • E-mail: npoa@npoa.info • http://www.npoa.info

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Letter D Truckee Donner Public Utility District (TDPUD)

Response D-1: The commenter requests that the Draft EIR review, consider, and compare the potential environmental impacts of GHG emissions if CalPeco were the electric service provider in the areas Nevada County LAFCo recommends removing from the TDPUD's current SOI.

As more fully described in the Project Description starting on page 2.0-5 of Section 2.0, Project Description, of the Draft EIR, the "project" for which the Draft EIR has been prepared is the required update to the Sphere of Influence of the Truckee-Donner Public Utilities District (TDPUD) and directly the Public Review DRAFT Sphere of Influence Plan Update Truckee Donner Public Utility District (dated July 21, 2011; revised and republished March 21, 2012). The Nevada County Local Agency Formation Commission (LAFCo) has undertaken the SOI update to satisfy their requirements under state law. The project as it is defined in Section 2.0 of the DEIR (consistent with published CEQA case law and CEQA Guidelines Section 15124) is not the direct comparison of the potential service providers against each other with the outcome the selection of the provider having the lowest level of potential or probable impact. However, the revised **Appendix A** does provide such data in the event that LAFCo or the public seeks to compare the potential emissions differences between the TDPUD and CalPeco. Additionally, CEQA does not require LAFCo to provide an impact analysis of the previous SOI boundary (existing condition).

It is acknowledged that the Cortese-Knox-Hertzberg Act does direct LAFCos in the setting of spheres of influence to determine which agency would provide the best overall service based upon LAFCo policy and the directives of the act. If LAFCo determines in this instance to retain the TDPUD SOI in a particular geographic area based on a determination that the TDPUD may be the superior service provider, then it is certainly within Nevada County LAFCo's authority to make that decision.

As identified in **Tables 3.2-10, 3.2-11, and 3.2-12** of revised Section 3.2 contained in **Appendix A** of this Final EIR, it is identified that based on the available data, the TDPUD would provide electrical services that generate less GHG emissions than generated by the current provider, Liberty Utilities CalPeco. However, it has been further determined that regardless of who the provider of electrical utility service is, the impact would remain significant and unavoidable.

Response D-2: The commenter suggests that it is their opinion that the Draft EIR should contain additional information and reference to two documents: *TDPUD Review Draft Sphere of Influence Update and Municipal Service Review* and the TDPUD's Report to Nevada County LAFCo in April 2012.

It is noted that the first document is the "project" for the purposes of the Draft EIR and was the document which identified and proposed the LAFCO-recommended SOI boundary option. The analysis in the Draft EIR for the LAFCO-recommended SOI boundary option has been prepared as a result of the SOI boundary recommendation presented in that

document. The second document noted is a technical report prepared by the TDPUD and presented to Nevada County LAFCo as information. That document has not been referenced in the Draft EIR.

The following text change is made to Draft EIR page 2.0-5, fourth paragraph:

> The LAFCo-recommended SOI for the TDPUD is described below and includes distinct sphere boundaries for each of the District's services. In general, the LAFCo-recommended SOI does not include areas that are not expected or anticipated to require District services. As required by Commission policy, the LAFCo-recommended SOI defines the probable boundary of the agency's service area 20 years hence (the long-term horizon) as well as a near-term development horizon for lands likely to be annexed prior to the next sphere review or update (typically within five years). The SOI also designates an area of concern to indicate an area in which the land use actions of one agency may have impact on another. The LAFCo-recommended SOI is based on the *TDPUD Review Draft Sphere of Influence Update and Municipal Service Review.*

Response D-3: The commenter requests that the area within Placer County currently served by the Placer County Water Agency be excluded from the District-preferred SOI. The comment is noted for Nevada County LAFCo's consideration.

Response D-4: Referring to Draft EIR Section 3.2, the commenter states, "Had the impact been properly evaluated the proposed project will result in a significant increase in greenhouse gas emissions that will have a profound impact on the environment."

The commenter is referred to Master Response 2.4 and **Appendix A**, the revised Draft EIR Section 3.2, Climate Change and Greenhouse Gases. Section 3.2 has been revised from the most recent data available, including utility-specific information received from both CalPeco and the TDPUD. (**Appendix A** is considered to completely replace the original analysis in the Draft EIR, which is presented as **Appendix B** for comparison purposes.)

Response D-5: The commenter states Section 3.2 of the Draft EIR fails to the use of the most up-to-date and appropriate data. The commenter is referred to Master Response 2.4 and **Appendix A**.

As noted in Master Response 2.4, updated emission intensity factors (including power source mix and more recent data) specific to CalPeco and TDPUD were solicited and obtained in April 2013. This data was utilized in the re-estimation of GHG emissions and is reported in **Appendix A** (see **Tables 3.2-10**, **3.2-11,** and **3.2-12**). The re-modeling identified reduced GHG emissions for both Liberty Utilities CalPeco (from 67,837 metric tons annually in the original Draft EIR to 61,808 metric tons annually [6,029 metric ton reduction]) and TDPUD (from 45,130 metric tons annually in the original Draft EIR to 31,758 metric tons annually [13,372 metric ton reduction]). However, the Draft EIR impact conclusions for Impact 3.2.1 would remain the same as GHG emissions would still exceed the BAAQMD

numeric threshold for GHG per service population (4.6 metric tons). The less than significant impact determination for Draft EIR Impact 3.2.2 would also remain the same even with the GHG emission reductions.

Response D-6: The commenter suggests that the LAFCo-recommended SOI would have devastating economic impacts on the residents of the Truckee area. The Draft EIR is not required to consider the economic impacts of the project. The comment is noted for Nevada County LAFCo's consideration.

Response D-7: The commenter notes that page ES-1 of the Draft EIR contains an incorrect statement. The Draft EIR has been modified to address the comment, and the commenter is referred to FEIR Section 3.0, Errata. The following text has been revised in Draft EIR Section ES, page ES-1, to address this comment:

> The District currently serves approximately 12,500 water customers and 13,000 electricity customers. The electricity department owns and operates approximately ~~133~~ 135 miles of primary overhead and ~~82~~ 83 miles of primary underground electrical distribution circuits. Power is provided through 4 electrical substations and one distribution metering point ~~and 15 distribution circuits throughout~~ and is distributed from 17 distribution circuits throughout the greater Truckee area.

The following text has been revised in Draft EIR Section 2.0, page 2.0-1, to address this comment:

> The electricity department owns and operates approximately ~~133~~ 135 miles of primary overhead and ~~82~~ 83 miles of primary underground electrical distribution circuits. Power is provided through 4 electrical substations and one distribution metering point ~~and 15 distribution circuits throughout~~ and is distributed from 17 distribution circuits throughout the greater Truckee area.

Response D-8: The commenter states that the District-preferred SOI would not result in a potentially significant impact in terms of conflicts with local agency land use policies and regulations since Nevada County LAFCo is not a land use agency and its policies are not land use policies.

While LAFCo is not an agency empowered to directly regulate land use, the legislature made it clear in the Cortese-Knox-Hertzberg Act that LAFCos have major land use responsibilities in making their decisions, particularly to discourage urban sprawl and preserve and protect agricultural and open space lands (Government Code 56700, 56668(a)). As stated in *City of Ceres v. City of Modesto* (1969) 274 C.A. 2d 545 at 553:

> *LAFCO was created by the Legislature for a special purpose, i.e., to discourage urban sprawl and to encourage the orderly formation and development of local governmental agencies. In short, LAFCO is the "watchdog" the Legislature established to guard against the wasteful duplication of services that results from indiscriminate formation of new local agencies or haphazard Annexation of territory to existing local agencies.*

Each LAFCo is required to adopt local policies to implement the mandates of the Cortese-Knox-Hertzberg Act under Section 56375(a)(1). Nevada County LAFCo has adopted detailed policies. Because LAFCo is required to consider land use, and particularly to discourage the premature conversion of open space lands, Nevada County LAFCo has adopted policies that disfavor the extension of development services to open space lands.

As noted in the TDPUD comment, CEQA requires consideration of "Conflict with any applicable land use plan, policy, or regulation of any agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigation [of] an environmental effect." The relevant LAFCo policies considered in this section of the EIR are clearly policies related to land use and intended for the purpose of avoiding or mitigating the adverse impact of premature conversion of open space and agricultural lands.

In terms of potential significant impacts involving conflicts with local agency land use policies, the commenter is further referred to Draft EIR page 3.1-11, which states that the District-preferred SOI boundary proposes to maintain most of the area of the current TDPUD SOI for both water and electric service, as well as expand the electrical sphere to include certain areas. While the TDPUD-preferred SOI for electric and water service would include land areas that could utilize these services, the SOI update includes a substantial amount of designated open space in Nevada and Placer (Martis Valley Community Plan area) counties beyond what is proposed under the LAFCo-recommended SOI update (see Draft EIR Table 3.1-1). This would conflict with LAFCo general policy 2 (Section III (Spheres of Influence (A)(2)) and was identified as a potentially significant impact in the Draft EIR. However, as stated on page 3.1-12 of the DEIR, implementation of mitigation measure MM 3.1.1 would ensure that if the TDPUD-preferred SOI for electric and water service is approved, large land areas that are designated as open space would not be included, thereby reducing the potentially significant impact to a level that is less than significant.

Response D-9: The commenter states that the TDPUD's provision of electric and water service is driven by entitlements and development plans as opposed to SOI boundaries instigating the first step toward development.

The TDPUD is incorrect in arguing that "the District's SOIs are simply an indication that the District has the ability, and desire, to provide water and electrical service to new areas" and are therefore not the "first step" in a series of action that could provide water and electricity to new areas. The SOI for a district is not generated by the District but by LAFCo. While certainly the ability and desire of the District are given considerable weight by LAFCo, Nevada County LAFCo is determining on behalf of the public as a whole whether it makes sense to allow a district the potential to provide service to a particular area. Even where the county or city may be willing to grant entitlements, LAFCo is not bound to allow the District to provide services that would allow the development to proceed. That is

the essence of LAFCo's independent "watchdog" function. Therefore, the determination of a sphere is an important step in the process that ultimately leads to development and why environmental review of that sphere decision is necessary and required by CEQA.

The commenter is referred to pages 3.3-25 and -26 of the Draft EIR, which state that growth inducement under CEQA Guidelines Section 15126.2(d) is defined as:

> *...the way in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth...Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also...the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.*

A project can have direct and/or indirect growth inducement potential. Direct growth inducement would result if a project, for example, involved construction of new housing. A project would have indirect growth inducement potential if it established substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) or if it would involve a construction effort with substantial short-term employment opportunities that would indirectly stimulate the need for additional housing and services to support the new employment demand. Similarly, a project would indirectly induce growth if it would remove an obstacle to additional growth and development such as removing a constraint on a required public service. For example, a project providing an increased water supply in an area where water service historically limited growth could be considered growth-inducing.

Growth-inducement impacts are analyzed in Section 3.3 of the Draft EIR. The proposed project only consists of the establishment of a new Sphere of Influence for the TDPUD, and no other actions (i.e., annexations and associated infrastructure extensions and improvements) are being sought at this time. Therefore, the proposed project does not result in any direct change to the physical environment that could trigger any significant environmental impacts.

However, the establishment of a new SOI is the first step in a series of actions that could provide TDPUD electric and water service to land areas within Sierra County, the Town of Truckee, Placer County, and Nevada County that could support growth and development consistent with these agencies' general plans and any development approvals currently in place. The commenter is correct that development is primarily driven by the land use provisions of local agency general plans.

Response D-10: The commenter identifies a sentence from the Draft EIR as incorrect before recommending the same revision as shown in Response D-7.

Response D-11: The commenter notes that Table ES-1 does not differentiate between the Nevada LAFCo-recommended SOI and the TDPUD-preferred SOI in the Level of Significance Without Mitigation column. The commenter is correct in terms of Impact 3.1.1 determinations for impacts to local agency general plans, as both SOI scenarios were determined to result in less than significant impacts. The commenter is referred to pages 3.1-10 through -12 for a full discussion of Impact 3.1.1.

The commenter further states that the District-preferred SOI would not result in a potentially significant impact in terms of conflicts with local agency land use policies and regulations since Nevada County LAFCo is not a land use agency and its policies are not land use policies. The commenter is referred to Response D-8 regarding the rationale of this impact determination.

Response D-12: The commenter provides language which they recommend for mitigation measure MM 3.1.1 of the Draft EIR.

The following text changes are made to mitigation measure MM 3.1.1 on Draft EIR page 3.1-11 to include some of the suggested changes:

> Should Nevada County LAFCo wish to adopt the TDPUD-preferred Sphere of Influence for electric and water service, the sphere of influence plan shall include a policy that annexations will be approved only when water and/or electrical services are needed to serve development consistent with the land use designation of the subject territory ~~indicates development potential that requires the support of water and/or electrical service~~. Current TDPUD District Code 5.53.010.2 states, "No service shall be provided without prior annexation approval from the appropriate LAFCo."

Response D-13: The commenter states, "Level of significance without mitigation should be CC, similar to Impact 3.3.0."

It is unclear what is meant by this comment. While there is no "Impact 3.3.0" mentioned in the Draft EIR, the commenter does identify page ES-4 as the referenced page. Page ES-4 of the Draft EIR correctly identifies a "cumulatively considerable" (CC) impact for Impact 3.3.1 and a "less than cumulatively considerable" (LCC) impact for Impact 3.3.2.

Response D-14: The commenter notes that page 1.0-1 of the Draft EIR contains an incorrect statement. The commenter is incorrect in the facts of their comment. In 1998, Nevada County LAFCo updated the Nevada County portion of the TDPUD SOI and took no action on the portion of the SOI in Placer County. However, the Draft EIR has been modified in an attempt to clarify the action that occurred in 1998, and the commenter is referred to FEIR Section 3.0, Errata. The following text has been revised in Draft EIR Section 1.0, page 1.0-1, to address this comment:

> The Truckee Donner Public Utility District (TDPUD; District) is a multicounty special district that provides water and electric utility services. The current TDPUD Sphere of Influence boundary, which was established in 1983~~, with the Nevada County portion~~ and updated in

1998 (Nevada County portion only), encompasses most of the lands within the Town of Truckee and adjacent unincorporated areas of Nevada and Placer counties.

Response D-15: The commenter states that the Town of Truckee and the counties of Sierra, Placer, and Nevada should be listed as trustee or responsible agencies, as there are significant and unavoidable impacts identified in the Draft EIR.

The proposed project would not specifically implement or directly result in the construction of any new facilities but would indirectly facilitate growth. Trustee state agencies whose resources could be affected by that growth include the California Department of Fish and Wildlife. Legally there are no "responsible agencies" with direct discretionary approval power over the project here—the TDPUD Sphere of Influence. Only Nevada County LAFCo approves the sphere. Nevertheless the agencies that will issue subsequent land use entitlement—the Town of Truckee, Nevada County, Sierra County, and Placer County—certainly should take into account the sphere adopted by LAFCo for the TDPUD and this EIR in making their land use decisions. That is why this EIR has been circulated to all of these trustee and affected agencies for their comments.

Response D-16: The commenter asks how information and mapping used from other completed environmental impact reports completed within the proposed project area is used to determine impacts of the proposed project.

As stated on pages 1.0-1 and -2 of the DEIR, the lands involved in the SOI update are within the Town of Truckee, Nevada County, Sierra County, and Placer County, which are areas regulated by the Town of Truckee General Plan, the Nevada County General Plan, the Sierra County General Plan, and the Martis Valley Community Plan. (The Placer County General Plan defers to the Martis Valley Community Plan Land Use Diagram to provide the specific land use designations for the areas of Placer County (Martis Valley) affected by the proposed project.) Pursuant to Sections 15168 and 15161 of the CEQA Guidelines which address project and program environmental impact reports, respectively, and utilizing the provisions established via CEQA Guidelines Section 15150, Incorporation by Reference, this Draft EIR uses and draws upon the analysis and conclusions of these completed environmental impact reports associated with the land use designations set forth in the plans. Additionally, CEQA Guidelines Section 15130(b)(1)(B) relating to cumulative impacts allows the use of impacts identified and assessed by a general plan to be utilized in place of a listing of specific pending projects within the project area. In this instance, the DEIR incorporated the growth assumptions contained within the respective general plans to determine the potential buildout assumptions for the purposes of quantifying the growth within the project area and identifying and addressing potentially resulting impacts.

Designated land uses and development potential under the local general plans is identified in Table 3.3-3 through 3.3-5 (identify acreages and development potential in dwelling units and square footage based on GIS mapping data of general plan land use designation maps and the general

plan land use elements) of the Draft EIR and Draft EIR pages 3.3-24 and -25 identifies how these general plans and their associated EIR are utilized in the analysis. The commenter is directed to revised **Figure 2.0-2**, LAFCo-Recommended Sphere of Influence, identifying the Town of Truckee's Sphere of Influence relative to the LAFCo-recommended SOI boundary.

Response D-17: The commenter states that the letters from both the Northstar Community Service District and the Northstar Property Owners Association were not included in Appendix 1.0 of the Draft EIR.

These letters are included as Exhibit 3 and Exhibit 4 of this comment letter. However, these were not comment letters on the Notice of Preparation, which was what Draft EIR Appendix contains (in addition to the Notice of Preparation). Thus, these letters were not provided in the Draft EIR

Response D-18: The commenter notes that page 2.0-1 of the Draft EIR contains an incorrect statement. The Draft EIR has been modified to address the comment, and the commenter is referred to FEIR Section 3.0, Errata. The commenter is referred to Response D-7.

Response D-19: The commenter states that the Draft EIR fails to describe the objectives of the TDPUD, the purpose of the project, or the rationale for the proposed LAFCo-recommended SOI. The commenter suggests inclusion of the *Public Review DRAFT Sphere of Influence Plan Update Truckee Donner Public Utility District and Municipal Service Review* and the TDPUD's Report to the Nevada Local Agency Formation Commission dated May 2012 in order to compare the magnitude of impacts in relation to the benefits anticipated in making the finding necessary to address the identified significant and unavoidable impacts.

Nevada County LAFCo is the lead agency for the proposed project and therefore only the objectives of LAFCo, and not the TDPUD, are identified. As stated on page 2.0-2 of the Draft EIR, the objective of the project is to update the TDPUD SOI as required by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 Sections 56425 and 56430, consistent with public service conditions present or reasonably foreseeable in the proposed SOI amendment area. As stated on page 2.0-5 of the Draft EIR, the rationale for the proposed LAFCo-recommended SOI is that it does not include areas that are not expected or anticipated by Nevada County LAFCo to require District services. As required by LAFCo policy, the LAFCo-recommended SOI defines the probable boundary of the agency's service area 20 years hence (the long-term horizon) as well as a near-term development horizon for lands likely to be annexed prior to the next sphere review or update (typically within five years).

The *Public Review DRAFT Sphere of Influence Plan Update Truckee Donner Public Utility District and Municipal Service Review* is available at the Nevada County LAFCo website: http://www.mynevadacounty.com/nc/lafco/Pages/TDPUD---SPHERE-OF-INFLUENCE-UPDATE.aspx. The TDPUD's Report to Nevada County LAFCo in April 2012 was utilized in describing the TDPUD-preferred SOI that was evaluated in the Draft EIR.

Response D-20: The commenter notes that page 2.0-2 of the Draft EIR contains an incorrect statement. The commenter is incorrect in the facts of their comment. In 1998, Nevada LAFCo updated the Nevada County portion of the TDPUD SOI and took no action on the portion of the SOI in Placer County. However, the Draft EIR has been modified in an attempt to clarify the action that occurred in 1998, and the commenter is referred to FEIR Section 3.0, Errata. The following text has been revised in Draft EIR Section 2.0, page 2.0-2, to address this comment:

> The current SOI for the TDPUD was established in 1983~~,~~ and ~~the Nevada County portion was~~ updated in 1998 (Nevada County portion only).

Response D-21: The commenter notes that page 2.0-2 of the Draft EIR contains an incorrect statement.

The commenter fairly points out that the existing TDPUD service area and SOI boundary are not coterminous and may not be considered to be "almost coterminous" by some persons. This situation may further be confusing as the original SOI boundary for the TDPUD was a single unified SOI and with the proposed project there is proposed two separate SOIs, one each for electrical and water service. The Draft EIR has been modified to address the comment, and the commenter is referred to FEIR Section 3.0, Errata. The following text has been revised in Draft EIR Section 2.0, page 2.0-2, to address this comment:

> ~~The TDPUD electric service SOI was determined to be almost conterminous with the TDPUD's electric service area; thus, the electrical service area is somewhat smaller than the District's boundaries as it does not include the eastern portion of Glenshire.~~

Response D-22: The commenter requests that Figure 2.0-1 show the Town of Truckee SOI. A revised Figure 2.0-2, LAFCo-Recommended Sphere of Influence, has been prepared showing the Town of Truckee's SOI boundaries as suggested by the commenter. The commenter is referred to FEIR Section 3.0, Errata.

Response D-23: The commenter requests the General Plan Land Use Maps for Truckee and Nevada, Placer, and Sierra counties.

The commenter is referred to Figure LU-1 on page 2-9 of the Town of Truckee 2025 General Plan Land Use Element for the General Plan Land Use Map of the Town of Truckee.
http://www.townoftruckee.com/index.aspx?page=470

The commenter is referred to the following website for the General Plan Land Use Map of Nevada County.
http://www.mynevadacounty.com/nc/igs/gis/Pages/General-Plan-Maps.aspx

The commenter is referred to page 4 of the Placer County General Plan for the General Plan Land Use Map of Placer County.
http://www.placer.ca.gov/departments/communitydevelopment/planning/documents/commplans/pcgp

The commenter is referred to **Appendix C** of this document for the General Plan Land Use Map of Sierra County, which is not available online. It is noted here that copies of all of the general plans, the Community Plan and their respective land use maps incorporated by reference as part of this project are available for review and inspection at the Nevada County LAFCo offices during regular business hours.

Designated land uses and development potential under the local general plans is identified in Draft EIR Tables 3.3-3 through 3.3-5 (identify acreages and development potential in dwelling units and square footage based on GIS mapping data of general plan land use designation maps and the general plan land use elements) of the Draft EIR. Draft EIR pages 3.3-24 and -25 identify how these general plans and their associated EIRs are utilized in the analysis.

Response D-24: The commenter notes errors associated with Figure 2.0-2. The Draft EIR has been modified to address the comment, and the commenter is referred to FEIR Section 3.0, Errata. Figure 2.0-2 has been revised to address this comment.

Response D-25: The commenter states that when it is most economical for the closest electrical utility to provide service, the two electric utilities can enter into a Fringe Area Agreement and that the TDPUD is currently involved in Fringe Area Agreements. The comment is noted for Nevada County LAFCo's consideration. The proposed long-term SOI for electrical services is based on compliance with LAFCo policies and the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

Response D-26: The commenter states that the addition of the Northstar area is proposed under the TDPUD-preferred SOI for electric service only and that fact should be made clear on several identified pages. The commenter is referred to Figure 2.0-4 of the Draft EIR located at the end of Section 2.0. Figure 2.0-4 clearly demarcates and shows that the District-preferred SOI does not include the Northstar area within the proposed *water* service area SOI of the TDPUD.

Most of the pages identified by the commenter as needing more clarification of the fact that the District is not proposing the inclusion of the Northstar area in its water service SOI are contained in Section 4.0, Alternatives. As a point of clarification, two of the alternatives under consideration, Alternative 2 and Alternative 3, do consider the inclusion of the Northstar area into the TDPUD water service SOI. However, Alternative 2 and Alternative 3 are merely alternatives to the proposed LAFCo-recommended SOI and District-preferred SOI and not the proposed project itself. No changes to the Draft EIR are recommended.

Response D-27: The commenter states that since the Draft EIR does not clearly separate public and private lands in the area calculation, it overstates the potential impacts of these lands within the SOI. The commenter is referred to Table 3.1-1 in Section 3.1 of the Draft EIR, which identifies the acreage and land use designation of the proposed SOIs (including the identification of 1,431

acres of designated forest areas under federal ownership). The total lands in state and federal ownership consist of the following:

Sierra County Lands in State/Federal Ownership
- LAFCo-recommended SOI: 0 acres
- TDPUD-preferred SOI for water services: 0 acres
- TDPUD-preferred SOI for electrical services: 1,431 acres

Nevada County Lands in State/Federal Ownership
- LAFCo-recommended SOI: 179 acres
- TDPUD-preferred SOI for water services: 8,494 acres
- TDPUD-preferred SOI for electrical services: 23,456 acres

Placer County Lands in State/Federal Ownership
- LAFCo-recommended SOI: 642 acres
- TDPUD-preferred SOI for water services: 11,276 acres
- TDPUD-preferred SOI for electrical services: 11,294 acres

Draft EIR Tables 3.3-3 through 3.3-5 identify the extent of growth potential in the LAFCo-recommended SOI and District-preferred SOI, which is based on general plan land use designations and associated allowed development potential under each general plan and GIS mapping of general plan land uses. The total development potential shown in Tables 3.3-3 through 3.3-5 does not factor existing development.

Response D-28: The commenter states that the regulatory discussion on page 3.1-3 regarding the Town of Truckee should include reference to the Town's SOI not just the General Plan. However, unincorporated lands within the Town's SOI are still under the regulation of Nevada County until they are annexed by the Town, and the applicable land use designations are still those of Nevada County until the time of annexation. It is assumed with this comment that the commenter is seeking the inclusion of information identifying and describing that the Town of Truckee General Plan and General Plan Land Use Map designate land uses in certain areas of the Town's SOI with land use designations and growth assumptions. The commenter is correct that the Town's General Plan does establish land use and growth projections for areas identified as PRD 1 and PRD 2, which are within the SOI area and have similar development potential as that established under the Nevada County General Plan used in the Draft EIR (PRD 1 provides for 38 dwelling units, while PRD 2 consists of a portion of a Planned Development area under the Nevada County General Plan that allows of a total of 276 dwelling units). However, DEIR Section 3.1.2 only establishes the Regulatory Framework for the analysis in the following document section and does not contain detailed land use data or narrative, nor does this section provide evaluation or analysis. As such, no modifications have been made to this section. The comment does not specifically address an environmental impact or present information that would change a conclusion of the analysis in the section.

Response D-29: The commenter states that the LAFCo-recommended SOI would physically divide an established community. CEQA evaluates the physical environmental effects of a project. A significant environmental effect

associated with the division of an establish community under CEQA would involve the physical separation of a community such as the development of a highway (e.g., Interstate 80 is an example of division of the Town of Truckee), railroad line, or other physical that inhibits community interaction. Draft EIR page 3.1-9 identifies that both proposed SOIs would not place structures and/or land uses incompatible with existing land use or otherwise disrupt or divide the physical arrangement of an established community and would not conflict with an applicable land use plan. The commenter is correct in stating the entire Glenshire community is provided electrical service by two different service providers. However, the provision of different electrical service providers within a community would not involve new infrastructure that would separate the Glenshire area (similar to different telephone service providers providing service to the same community). Thus, the proposed LAFCo-recommended SOI would not result in a physical change that would divide the Glenshire area.

Response D-30: The commenter states that the LAFCo-recommended SOI would physically divide an established community. The commenter is referred to Response D-29.

Response D-31: The commenter states that page 3.1-10 does not address consistency with the Town of Truckee SOI.

Impact 3.1.1 on page 3.1-10 of the Draft EIR evaluates whether or not the LAFCo-recommended and TDPUD-preferred update of the SOI for the TDPUD would conflict with local agency land use policies or regulations (including Nevada County LAFCo). The Town of Truckee SOI is not a land use policy or regulation, and the proposed SOIs (LAFCo-recommended and TDPUD-preferred) would not establish new land use designations, modify land use policies of the Town or County, or change the density or intensity factors applicable to the SOI area. The western and northern portions of the Town of Truckee SOI are currently within TDPUD boundaries. It is acknowledged that the TDPUD-preferred SOIs for water and electric service encompass the entire Town of Truckee SOI, while the LAFCo-recommended SOI does not include the southeastern portion of the Town of Truckee SOI. The commenter is referred to Response D-28 regarding land use designations in the Town of Truckee SOI.

Response D-32: The commenter states that mitigation measure MM 3.1.1 mandates actions to be completed by entities other than the lead agency and therefore Impact 3.1.1 should be identified as significant and unavoidable.

The mitigation measure does not rely upon the actions of other agencies to achieve its ameliorative effect. The measure requires LAFCo not to approve any annexations into certain areas that are currently open space lands until actual development entitlements are issued for development in those areas. This assures that the services will not be extended prematurely into those areas until there is a demonstrated need for such services as evidenced by the issuance of entitlements. Therefore, mitigation measure MM 3.1.1 is appropriate and within LAFCo's

jurisdiction. The commenter is referred to Response D-12 for changes made to mitigation measure MM 3.1.1.

Response D-33: The commenter states that since the TDPUD receives hydroelectric power from Stampede Reservoir Dam, the open spaces from Stampede Reservoir Dam to Russell Valley and Hobart Mills could contain TDPUD facilities. As identified in Draft EIR Table 3.1-1, the TDPUD-preferred SOIs for water and electric service includes 1,800 acres of designated Open Space/Water in Placer County associated with the Martis Creek Lake National Recreation Area managed by the U.S. Army Corps of Engineers. New demand for water and electric service for development in this land area is not expected. Thus, this portion of the TDPUD-recommended SOIs conflicts with LAFCo policies regarding open space protection. It is noted and described throughout the DEIR that the District has both generation and transmission facilities currently existing within lands designated Open Space that could provide justification for LAFCo to include such lands in the SOI if it is determined that having them within the District's boundaries could provide a service benefit. However, the commenter provides no technical analysis that supports the need to include such lands within the SOI area or which provides justification for the overriding of existing LAFCo policy for this purpose.

Response D-34: The commenter states that the discussion under Impact 3.1.2 should disclose any policies discouraging growth in designated open space areas, though should note that if major infrastructure passes through or near such areas, it could encourage growth.

Draft EIR Tables 3.3-3 through 3.3-5 identify the extent of growth potential in the LAFCo-recommended SOI and District-preferred SOIs, which is based on general plan land use designations and associated allowed development potential under each general plan and GIS mapping of general plan land uses. For instance, Table 3.3-3 identifies 12.9 acres of Nevada County–designated open space within the LAFCo-recommended SOI as possessing no development potential. Draft EIR pages 3.3-25 through -52 summarize policies for the local general plans that address growth and infrastructure/utility services planning as well as provide mitigation of physical environmental effects of planned growth. Draft EIR Appendix 3.3 provides lists of the applicable local general plan policies addressed in Draft EIR Section 3.3. Therefore, the DEIR adequately discloses and considers the land use regulations that discourage development of the lands designated for open space.

Response D-35: The commenter questions the use and application of the Bay Area Air Quality Management District's (BAAQMD) greenhouse gas significance threshold for the proposed project.

The BAAQMD thresholds are based on substantial evidence and are therefore proposed to be used within this analysis. The greenhouse gas emissions from land use projects expected between now and 2020 built in compliance with these thresholds would achieve between 21 and 29 percent below "business-as-usual" (BAU) 2020 conditions and thus would be consistent with achieving an AB 32 equivalent reduction. (BAU is

defined as the pre-regulatory environment in terms of greenhouse gas emissions.)[1]

Projects with greenhouse gas emissions in conformance with these thresholds would not be considered significant for the purposes of CEQA. Although the emissions from such projects would add an incremental amount to the overall greenhouse gas emissions that cause global climate change impacts, emissions from projects consistent with these thresholds would not be a "cumulatively considerable" contribution under CEQA. Such projects would not be "cumulatively considerable" because they would be helping to solve the cumulative problem as a part of the AB 32 process.

As stated on page 3.2-11 of the Draft EIR, the Northern Sierra Air Quality Management District (NSAQMD) does not currently have an adopted threshold of significance for GHG emissions. As stated on pages 3.2-10 and -11, utilization of the BAAQMD's greenhouse gas threshold has been considered reasonable and appropriate by NSAQMD staff in the cases of recent environmental impact reports published in Nevada County, including the Rincon Del Rio EIR (certified on April 9, 2013). In addition, more recent direction from the NSAQMD (dated March 27, 2013) resulting from follow-up to this comment regarding appropriate greenhouse gas significance thresholds is described below (Longmire 2013):

> *Since the NSAQMD still has not adopted GHG [greenhouse gas] thresholds for CEQA purposes, my opinion is that it is okay to use whatever established methodology or thresholds you would like to use to address GHG emissions.*
>
> *If you want to stick with BAAQMD the [Bay Area Air Quality Management District] methodology and thresholds, that is okay, too, as far as the NSAQMD is concerned.*

BAAQMD greenhouse gas thresholds provide an approach for determining if a project would result in greenhouse gas emissions that would not meet state reduction efforts under AB 32 (a 21–29 percent reduction of generated greenhouse gas emissions compared with business-as-usual conditions), which has been supported as an appropriate significance threshold approach under published case law (*Citizens for Responsible Equitable Environmental Development v. City of Chula Vista (Target Corporation)*, 2011 Cal.).

It is further noted that use of the only other formally adopted GHG emissions standard in California, as promulgated by the San Luis Obispo County Air Pollution Control District, would not change the significance

[1] The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. The California Air Resources Board (CARB) determined that achieving the 1990 emission level would require a reduction of GHG emissions of approximately 29 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business as usual"). In August 2012, CARB released revised estimates of the expected 2020 emissions reductions that identified a reduction in the projected 2020 emissions from 596 million metric tons (MMT) CO_2e to 545 $MMTCO_2e$. The reduction in projected 2020 emissions means that the revised BAU reduction necessary to achieve AB 32's goal of reaching 1990 levels by 2020 is now only 21 percent.

determination in this application, as the thresholds of significance are generally consistent with those used in the analysis of the DEIR. Additionally, use of the only other GHG emissions guidance protocol, as promulgated by the South Coast Air Quality Management District, also would not change the significance determination in this application for the same reasons. Until such time as the NSAQMD adopts a local GHG emissions threshold for the basin or provides further direction as to a preferred set of standards to utilize, use of emissions thresholds from other entities is the only available option for the analysis of greenhouse gas emissions in Nevada County.

It is not clear why the District is concerned about the use of thresholds of significance, such as those of the BAAQMD, generated for urban areas. Significance of an environmental impact is usually judged relative to its environmental setting. Thus, as pointed out in CEQA Section 15064(b): "the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area." If LAFCo were to develop its own threshold of significance for this area, if anything, it would likely be at a much lower level of GHG emissions than that set by the BAAQMD threshold to reflect the generally lower ambient level of GHG emissions in this area. Since the project already exceeds the BAAQMD threshold, it would certainly exceed any lower, locally developed threshold. In other words, there would be no change in the conclusion that the GHG impacts of this project are significant.

The resultant GHG emissions of proposed project implementation were calculated using the California Emissions Estimator Model (CalEEMod), version 2011.1.1, computer program. CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operational from a variety of land use projects.

Response D-36: The commenter questions the use and application of the BAAQMD's greenhouse gas significance threshold for the proposed project. The commenter is referred to Response D-35.

Response D-37: The commenter states that the selection of the 4.6 metric ton per service population significance threshold for greenhouse gases is arbitrary and the 6.6 metric ton per service population significance threshold would have been more appropriate.

The 6.6 metric ton per service population significance threshold is identified for the analysis of general plan documents. Since the proposed project is not a general plan project, the 4.6 metric ton per service population significance threshold was employed. It is further noted that use of the general plan threshold for greenhouse gas emissions would not change the significance determination in this application. As stated in Master Response 2.4, the original analysis (**Appendix B**) identified a CO_2e metric ton per service population ratio of 16.0 under the LAFCo-recommended SOI and 11.0 under the District-preferred SOI. The revised analysis (**Appendix A**) identifies a metric ton per service population ratio of 15.2 under the LAFCo-recommended SOI and 10.5 under the District-

preferred SOI. Therefore, project comparison to the general plan threshold of 6.6 metric tons per service population would still result in a cumulatively considerable and significant and unavoidable impact.

Response D-38: The commenter requests that the discussion on page 3.2-21 of the Draft EIR be revised in order to clarify that the District-preferred SOI for water service does not include the Northstar area.

This requested change was made in revision of Section 3.2 provided in **Appendix A** (see page 3.2-25).

Response D-39: The commenter states that the greenhouse gas analysis on page 3.2-22 is not derived from the same land uses as identified in Table 3.3-4. The commenter further notes that the Draft EIR contains no mitigation that addresses automobile trips.

The commenter is referred to **Appendix A**, the revised Draft EIR Section 3.2, Climate Change and Greenhouse Gases, specifically page 3.2-27. As stated on page 3.2-27 of the revised Draft EIR Section 3.2, Climate Change and Greenhouse Gases, the maximum growth potential assumptions for the District-preferred SOI are derived from Tables 3.3-4 and 3.3-5 of Section 3.3. PMC used GIS mapping data to develop these tables. As the District-preferred SOI for electric service is larger than the District-preferred SOI for water service, the growth potential from the proposed electric service SOI largely encapsulates that of the proposed water service SOI, with the exception that the proposed water service SOI allows for an additional 59 residential units in the area just east of the Town of Truckee. The commenter is correct that the Draft EIR contains no mitigation that addresses automobile trips. The regulation of automobiles is beyond the authority of Nevada County LAFCo, as is the regulation of land use patterns that affect transportation travel, which is within the jurisdiction of the Town of Truckee, Nevada County, Placer County, and Sierra County.

Response D-40: The commenter questions the impacts analysis of the Draft EIR's Section 3.2, Climate Change and Greenhouse Gases, regarding the use of the most up-to-date and appropriate data. The commenter is referred to Master Response 2.4.

Response D-41: The commenter questions the impacts analysis of the Draft EIR's Section 3.2, Climate Change and Greenhouse Gases, regarding the use of the most up-to-date and appropriate data. The commenter is referred to Master Response 2.4 as well as to Table 3.2-12 on page 3.2-27 of **Appendix A**, which addresses this comment.

Response D-42: The commenter states that the TDPUD will be able to achieve the requirements of the Renewables Portfolio Standard since it is already meeting these requirements. The commenter further comments that Liberty Utilities (CalPeco) will most likely not meet these requirements. The commenter is referred to **Appendix A**, the revised Draft EIR Section 3.2, Climate Change and Greenhouse Gases, specifically Impact 3.2.2, which contains an updated discussion of the proposed project and the Renewables Portfolio Standard.

As stated on page 3.2.29 of the revised Draft EIR Section 3.2, both CalPeco and the TDPUD are expected to achieve the mandated requirements of the Renewables Portfolio Standard program regardless of their respective SOI.

As stated on page 3.2.28 of the revised Draft EIR Section 3.2, the purchase power contract involving Liberty Utilities CalPeco's supply of electricity to its California customers guarantees the delivery of a specific and minimum verifiable amount of renewable energy. The amount of guaranteed renewable energy for 2012 and 2013 is 20 percent. The amount of renewable energy mix supplied to CalPeco's California customers in 2014 is set at 21.7 percent, and in 2015 the renewable mix percentage is contractually set at 23.3 percent (consistent with the Public Utilities Code – 20 percent by year 2017). A new renewable energy mix requirements contract has yet to be established for years beyond 2015. While Liberty Utilities CalPeco has yet to execute any contracts relating to its procurement of Renewables Portfolio Standard–eligible energy for the years beyond 2015, CalPeco is actively exploring its options and is confident that it will be able to enter the necessary commercial arrangements to satisfy its requirements under the Renewables Portfolio Standard program in 2016 and in the ensuing years. The commenter provision of proposed rate increases proposed by Liberty Utilities CalPeco and its impact on ratepayers is noted. However, this does not support the assertion that CalPeco will not be able to meet the requirements of the Renewables Portfolio Standard. It is acknowledged in **Appendix A** that the TDPUD is expected to have a better renewable energy mix than Liberty Utilities CalPeco (see Table 3.3-12).

Response D-43: The commenter states that Section 3.3 of the Draft EIR is flawed and contains no valuable information or analysis because it does not provide data on the amount of growth that could occur in the areas that lie outside of the LAFCo-recommended SOI yet within the TDPUD-preferred SOI.

The amount of growth between the LAFCo-recommended SOIs and the TDPUD-preferred SOIs is the difference between the total development potentials reported in Draft EIR Tables 3.3-3, 3.3-4, and 3.3-5 (which are based on local agency general plan land use designation maps and allowed development potential set forth in the land use elements). Using this data cited in the Draft EIR, the TDPUD-preferred SOI for electric service would accommodate an additional 13,069 dwelling units, 62.2 acres of additional commercial uses, and 6.4 acres of additional office uses. The TDPUD-preferred SOI for water service would accommodate an additional 7,575 dwelling units, 5.3 acres of additional commercial uses, and 5.4 acres of additional office uses. Draft EIR pages 3.3-25 through -52 provide a thorough analysis of the environmental effects of this growth based on the local agency general plans and their associated EIRs and provides a comparison of which SOI scenario generates the greatest impact by environmental issue area. The commenter provides no countering analysis or evidence on why the conclusions of the local agency general plans and associated EIRs are not valid in addressing the physical environmental effects of growth.

Response D-44: The commenter provides a synopsis of the discussion of Impact 3.3.1 of the Draft EIR. The commenter is referred to Response D-43 regarding comparison of growth impacts of the SOI options and to the discussion below in regard to the reality to the evaluation as to who may be the provider of any service within an area beyond the existing service boundary and LAFCo's responsibility to make such a decision.

The DEIR recognizes that there are other service providers which could provide service if the TDPUD does not. However, the purpose of this project is for Nevada County LAFCo to make a decision as to which service provider should provide that service in particular areas. Consequently for CEQA purposes, the project is to update the Sphere of Influence for the TDPUD, which may assist in the identification of a potential future service provider to these areas, whether through the TDPUD or another service provider. Regardless of who the identified provider is, provision of those services would facilitate growth. Therefore to comply with CEQA and provide a full disclosure of the potential impacts, LAFCo must start with the baseline of existing development and analyze those secondary growth impacts over the baseline. See *Environmental Planning and Information Council of Western El Dorado County, v. County of El Dorado* (1982) 131 Cal.App.3d 350.

Response D-45: The commenter states that secondary impacts would not be significant and unavoidable as determined in the Draft EIR because growth will occur even if there is no SOI update. The commenter also states that the growth numbers and associated estimates on impacts are "hyped."

As stated on page 3.3-25 of the Draft EIR, in updating the TDPUD's water and electric SOIs, Nevada County LAFCo is determining the probable physical boundary and electric and water service area of the District and is thus determining what future territory is eligible for annexation to the District. However, the TDPUD is not making any final determination to actually annex any territory to the District or specifically commit to the extension of infrastructure to service the update SOIs, and any actual annexation will require further discretionary review by Nevada County LAFCo. However, the establishment of new SOIs is the first step in a series of actions that could provide TDPUD water and electric service to land areas within the Town of Truckee and Sierra, Nevada, and Placer counties that could support growth and development consistent with these agencies' general plans and any development approvals that are currently in place.

Draft EIR Tables 3.3-3 through 3.3-5 identify the extent of growth potential in the LAFCo-recommended SOI and District-preferred SOIs, which is based on general plan land use designations and associated allowed development potential under each general plan and GIS mapping of general plan land uses (as cited under each table). The commenter provides no countering analysis or evidence that these growth projections are invalid or "hyped." Estimations on traffic generation from planned growth in the area are based on traffic generation rates utilized in the Town of Truckee and Placer County based on local land use and trip characteristics (see Draft EIR page 3.3-50).

The impact discussions are a summary of the significant physical environmental impacts of general plan growth and subsequent development and infrastructure extension in the project area that both the LAFCo-recommended SOI and District-preferred SOI would support. The discussion of the significant environmental impacts is based on technical analysis from the EIRs associated with the general plans.

The commenter is also directed to Response D-44 where the role and requirement of LAFCo to make a determination of who should be the service provider is again explained in light of its responsibilities pursuant to the Cortese-Knox-Hertzberg Act and relative to the requirements of CEQA and the analysis of secondary effects.

Response D-46: The commenter states that Section 3.3 is not based in fact yet rather on meaningless statistics that appear only to be included to create the illusion that there would be significantly greater impacts under the District-preferred SOI scenarios. The commenter is referred to Response D-45. As noted in Response D-45, the technical analysis provided in Draft EIR Section 3.3 is based on substantial evidence (general plans for Sierra, Nevada, and Placer counties and the Town of Truckee, as well as the associated general plan EIRs and the Martis Valley Community Plan and EIR) consistent with the definition of substantial evidence under CEQA Guidelines Section 15384. Thus, the Draft EIR is consistent with the analysis requirements of CEQA, and LAFCo would not be acting in an arbitrary and capricious manner in utilizing the EIR in support of actions regarding the TDPUD SOI.

The commenter is also directed to Response D-44 where the role and requirement of LAFCo to make a determination of who should be the service provider is again explained in light of its responsibilities pursuant to the Cortese-Knox-Hertzberg Act and relative to the requirements of CEQA and the analysis of secondary effects.

Response D-47: The commenter states that Section 3.3 does not contain a discussion of the planned areas of growth within the proposed SOI scenarios and further states that there is no basis for the conclusion that a reduction in the SOI would reduce economic growth.

The commenter is referred to Tables 3.3-3 through 3.3-5, which identify the extent of planned growth potential in both the LAFCo-recommended and the District-preferred SOIs.

As shown on pages 3.3-51 through -52, the conclusion that omitting lands designated for development from the SOI would reduce economic growth is based on the concept that reducing the SOI would restrict the amount of growth by restricting the extension of electric and water service. Where there is no alternative public service provider, the reduction in the sphere could directly limit growth. In those areas where there are existing alternative suppliers, the impact on growth is more difficult to predict. For example, while the Placer County Water Agency can and does provide some water service in the Martis Valley, whether it would be willing to greatly expand its services to accommodate all of the

growth planned for the area is unclear. In order to provide full disclosure of potential impacts where there is this uncertainty, the EIR analyzes all growth impacts.

Response D-48: The commenter states that the No Project Alternative analysis in Section 4.0 of the Draft EIR is flawed as it is not consistent with CEQA Section 15126.6(e).

The purpose of describing and analyzing a No Project Alternative is to allow decision-makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. The No Project Alternative analysis in Section 4.0 of the Draft EIR is adequate. As stated on page 4.0-2 of the Draft EIR, the No Project Alternative is required to be analyzed per CEQA Guidelines Section 15126.6(e), which states that a discussion of the "no project" alternative will *usually* proceed along one of two lines [italics used for emphasis]. The proposed project is distinct from most projects analyzed under CEQA in that it does not propose direct physical actions affecting the environment but instead an SOI update as required by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, Sections 56425 and 56430. Therefore, in the case of the project, the No Project Alternative does not proceed along either of the two lines described in CEQA Guidelines Section 15126.6(e). The Cortese-Knox-Hertzberg Act requires Nevada County LAFCo to update the SOI for all applicable jurisdictions in the county. If no update is completed, the current sphere plan would be out of date and violative of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 Section 56425(g). Without a current sphere plan, LAFCo could not proceed with any annexations because it could not make the findings of consistency with that sphere. Therefore, the "no project" alternative would have the practical effect of limiting District service to its existing boundaries, i.e. a "coterminous" sphere.

Response D-49: The commenter states that the Draft EIR provides no data to justify the conclusion that the No Project Alternative would not conflict with applicable plans.

The No Project Alternative would not result in any conflicts with Sierra County, Town of Truckee, Nevada County, and Placer County general plan and zoning designations and development standards, as the SOI is associated with the future provision of water and electric service and does not alter land use designations or local general plan policies regarding land use or growth. It is noted that while the project would not result in any conflicts with the various general plan documents or modify any agency standards or policies, limiting the provision of future water service might limit the ability of the respective agency to fully implement its general plan as adopted.

Response D-50: The commenter states that the No Project Alternative is flawed due to the assumption used that CalPeco will achieve compliance with the Renewables Portfolio Standard. The commenter is referred to **Appendix A**, the revised Draft EIR Section 3.2, Climate Change and Greenhouse Gases, specifically to Impact 3.2.2, which contains an updated discussion of the

proposed project and the Renewables Portfolio Standard. The commenter is also referred to Response D-42 regarding CalPeco's ability to attain the Renewables Portfolio Standard.

Response D-51: The commenter states that the Draft EIR fails to identify the Environmentally Superior Alternative.

The commenter is incorrect. As stated on page 4.0-11, the No Project Alternative would have less adverse environmental impacts than the LAFCo-recommended SOI and the TDPUD-preferred SOI for electric and water services and would be the environmentally superior alternative. However, the No Project Alternative would not meet the primary objective of the proposed project, which is implementation of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. Alternatives 2 though 4 would provide environmental benefits in comparison with the TDPUD-preferred SOI for electrical service. Beyond the No Project Alternative, Draft EIR Table 4.0-1 identifies that the LAFCo-recommended SOI option have the least environmental impacts and would be environmentally superior alternative of all the options and alternatives evaluated. Thus, the Draft EIR does identify environmentally superior alternatives to both LAFCo-recommended SOI and the TDPUD-preferred SOI for electric and water services. The following text changes are made to the Draft EIR page 4.0-11 to clarify this.

> Based on the evaluation described in this section, the No Project Alternative would have less adverse environmental impacts than the LAFCo-recommended SOI and the TDPUD-preferred SOI for electric and water services <u>and would be the environmentally superior alternative</u>. However, the No Project Alternative would not meet the primary objective of the proposed project, which is implementation of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. Alternatives 2 though 4 would provide environmental benefits in comparison with the TDPUD-preferred SOI for electrical service. <u>Beyond the No Project Alternative, Draft EIR Table 4.0-1 identifies that the LAFCo-recommended SOI option have the least environmental impacts and would be environmentally superior alternative of all the options and alternatives evaluated.</u>

Response D-52: The commenter states that Figure 1 of Appendix 1.0 of the Draft EIR does not accurately reflect the TDPUD's existing service territory within Placer County. As presented in the DEIR, it is acknowledged that Figure 1 is not reflective of the annexation of Placer County territory to the TDPUD as approved by Placer County LAFCo. The commenter is referred to Figure 2.0-1 on page 2.0-3 of the Draft EIR, which was used in the analysis of the Draft EIR.

Response D-53: The commenter states that Figure 2 of Appendix 1.0 does not differentiate Nevada County LAFCo's recommended SOI from the TDPUD's preferred SOI. The commenter is referred to Figures 2.0-2 through 2.0-4 of Section 2.0 of the Draft EIR for the distinction between the LAFCo-recommended SOI and the District-preferred SOI, which were used in the analysis of the Draft EIR.

Response D-54: The commenter states that Nevada County LAFCo must revise the Area of Concern or wait for related comments from the Placer LAFCo before certifying this EIR. The "area of concern" is not part of the SOI and does not establish any specific timing expectation for a future SOI expansion or annexation. Thus, the lack of establishing an "area of concern" in Placer County is not a violation of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, and no physical environmental impacts would occur regarding the lack of establishing an "area of concern" in Placer County.

Letter E

N·C·S·D
Northstar Community Services District
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March 7, 2013

Nevada County LAFCO
SR Jones, Executive Officer
Via email

RE: Truckee Donner Public Utility District Sphere of Influence Plan Update

The Northstar Community Services District (NCSD) has the following comments on the Sphere of Influence Update for the Truckee Donner Public Utility District (TDPUD) Draft EIR dated February, 2013.

The NCSD supports the Nevada County LAFCO's proposal to eliminate the TDPUD's water sphere of influence in the Martis Valley area of Placer County currently being served by the Placer County Water Agency (PCWA). The NCSD also objects to the TDPUD preferred water sphere of influence in this area of Placer County as it results in an unnecessary duplication of services. Furthermore, the NCSD contracts with PCWA to operate this system and the agencies have constructed a physical intertie between the PCWA and NCSD systems eliminating any need for TDPUD service in this area. **E-1**

The NCSD would support the TDPUD's request to include in their water sphere of influence the areas to the west of Highway 89 and south of Donner Lake as well as those areas in unincorporated Placer County that are currently receiving water. **E-2**

Sincerely,

Mike Staudenmayer
General Manager

Cc: Kristina Berry, Placer County LAFCO
Brian Martin, PCWA
Michael Holley, TDPUD

Letter E Mike Staudenmayer, General Manager, Northstar Community Services District

Response E-1: The commenter states that the Northstar Community Services District (NCSD) supports the LAFCo-recommended proposal to eliminate the TDPUD's water service SOI in the Martis Valley area of Placer County and objects to the District-preferred water service SOI. The commenter further states that there is no need for TDPUD service in the area. The comment is noted for Nevada County LAFCo's consideration.

Response E-2: The commenter states that the NCSD would support the District-preferred SOI encompassing areas to the west of Highway 89 and south of Donner Lake as well as areas in unincorporated Placer County that are currently receiving water. The comment is noted for Nevada County LAFCo's consideration.

MTG Comments Received at the March 21, 2013, LAFCo Meeting

The following are summaries of comments on the Draft EIR made at the March 21, 2013, LAFCo meeting and responses to those comments.

Meeting Comment 1: Commissioner Anderson: Notes that the numbering on map 2.0-2 does not correctly correspond to the descriptions starting on page 2.0-5. Also, notes that a parcel depicted on the original LAFCo-recommended sphere map (the one prepared by M. Brandman and Associates) does not appear to be depicted on map 2.0-2.

Response 1: Figure 2.0-2 has been corrected to match the Draft EIR description. While the figure color scheme and description have changed from the original LAFCo-recommended sphere map, the proposed extent of the SOI recommended by LAFCo staff shown in Figure 2.0-2 is the same.

Meeting Comment 2: Commissioner Anderson: Observes that the TDPUD-preferred proposal triggers fewer GHG emissions.

Response 2: The commenter is correct regarding total GHG emissions. Updated GHG emissions using data from the TDPUD and CalPeco are provided in **Appendix A**, which consists of a revised Draft EIR Section 3.2, Climate Change and Greenhouse Gases.

Meeting Comment 3: Commissioner Norsell: Suggests that LAFCo should consider including some of the areas in the TDPUD proposal in the long-term sphere.

Response 3: The Draft EIR evaluates both the LAFCo-recommended SOI and the TDPUD-preferred SOI for water and electric service at an equal level of detail that would allow LAFCo to adopt either SOI update or a combination of the two.

Meeting Comment 4: Commissioner Flora: Remarks that there is a discrepancy between Draft EIR page 3.2-23 regarding the Renewables Portfolio Standard (RPS) between the TDPUD's report and the Draft EIR prepared by the consultant. The District's report states a current RPS of 33 percent, and that it is likely to increase to 40 percent by the year 2014.

Response 4: The Draft EIR utilized base available data and technical information that could be verified in the preparation of the greenhouse gas analysis in Draft EIR Section 3.2, Climate Change and Greenhouse Gases. As noted in Master Response 2.4, updated emission intensity factors (including power source mix and more recent data) specific to Liberty Utilities CalPeco and the TDPUD were solicited and obtained in April 2013. This data was utilized in the re-estimation of GHG emissions and is reported in **Appendix A** (see **Tables 3.2-10**, **3.2-11,** and **3.2-12**). The re-modeling identified reduced GHG emissions for both Liberty Utilities CalPeco (from 67,837 metric tons annually in the original Draft EIR to 61,808 metric tons annually [6,029 metric ton reduction]) and the TDPUD (from 45,130 metric tons annually in the original Draft EIR to 31,758 metric tons annually [13,372 metric ton reduction]). However, the Draft EIR impact conclusions for Impact 3.2.1 would remain the same, as GHG emissions

would still exceed the BAAQMD numeric threshold for GHG per service population (4.6 metric tons). The less than significant impact determination for Draft EIR Impact 3.2.2 would also remain the same, even with the GHG emission reductions.

Meeting Comment 5: Commissioner Bender: Referenced the Draft EIR as it states the Liberty Energy RPS as 20 percent and the TDPUD RPS as 22 percent. He further noted the TDPUD report represents the Northstar load (RPS?) as 29 percent.

Response 5: The commenter is referred to Response 4 regarding RPS and re-modeling of greenhouse gas emissions.

Meeting Comment 6: Commissioner Norsell: Asks what standards the consultant uses to verify data.

Response 6: PMC utilized data from the California Public Utility Commission and the California Energy Commission, which are referenced on Draft EIR pages 3.2-25 and -26.

Meeting Comment 7: Commissioner Flora: Can the commission direct PMC to use the District's data?

Response 7: The commenter is referred to Response 4 regarding RPS and re-modeling of greenhouse gas emissions associated with RPS compliance.

Meeting Comment 8: Commissioner Anderson: District asserts it can provide power more efficiently. Staff should provide (supplemental) information that will be useful for this.

Response 8: Comment noted. The commenter is referred to Response 4.

Meeting Comment 9: Commissioner Norsell: Economic impacts should be addressed in the staff report, not the EIR.

Response 9: Comment noted. CEQA does not require EIRs to evaluate economic impacts of a project.

Meeting Comment 10: Michael Holley, TDPUD GM: Notes that the E. Mulberg document was substandard and created conflict between the TDPUD and LAFCo. Remarks that electrical service is complicated and has long-term planning requirements. Feels that the EIR has some accuracy issues:

- GHG portfolio data, for example. Contrasts the DEIR's use of 2005 data for the TDPUD vs. 2011 for Liberty. Says the TDPUD data has been provided to the CEC and PUC.
- Use of BAAQMD model. Thinks it's not applicable. Believes it's not the only model available. Doesn't question the calculation of metric tons.
- Notes that there has been a big shift between 2005 and 2011 with the district portfolio. They now have no coal and a much better portfolio.

- The DEIR doesn't adequately analyze the impacts of adopting the LAFCo-recommended sphere vs. the District-preferred sphere. He wonders how a conclusion can be reached that there are fewer impacts from retaining territory in the service area of a provider that is a higher polluter.

Response 10: The commenter is referred to Response 4 regarding comments on GHG portfolio data. The Draft EIR did not utilize a model from BAAQMD. Draft EIR Section 3.2, Climate Change and Greenhouse Gases, used BAAQMD numeric thresholds for evaluating GHG emissions from growth within the proposed SOIs. The commenter is referred to Response D-35 regarding the appropriateness of using this threshold.

Draft EIR Section 3.2 (see Draft EIR pages 3.2-12 through -24 and **Appendix A** of this document) and Section 3.3 (Draft EIR pages 3.3-25 through -52) identifies the difference between the LAFCo-recommended SOI and the TDPUD-preferred SOIs for water and electric service. As noted in Response D-1, the purpose of the EIR is to address the physical environmental effects of the proposed project and not on current existing baseline conditions associated with electric service. However, the Draft EIR and **Appendix A** (see Table 3.2-12) identify that TDPUD electric service would utilize more renewable energy sources than CalPeco.

Meeting Comment 11: Kerry Shea, Counsel from Liberty: CalPeco supports the EIR's analysis. Points out that the GHG analysis uses a proxy for the state, rather than actual numbers. Questions the use of that data. Ms. Shea points out that during some of the GHG analysis in the TDPUD report, a proxy was used—46 percent coal statewide factor annual power content level. Ms. Shea suggests only using a proxy when it is appropriate.

She further urged LAFCo and the consultant to look carefully at statements which have no backup. Speculation that Northern California utilities will have rate increases is not a basis for assuming CalPeco rates will also increase. Ms. Shea further stated consumer rates are governed by the CPUC, and there are safeguards in place about approval of costs. Ms. Shea stated CalPeco is a unique animal in that they reside in California, but are not part of the larger California system that includes such companies as ISO, San Diego, Edison, and PG&E.

Response 11: The commenter is referred to Response 4 regarding RPS and re-modeling of greenhouse gas emissions.

Meeting Comment 12: Commissioner Bender: Notes that the area of concern in Placer County per the LAFCo-recommended option should be expanded, consistent with the Truckee Sanitation District's.

Response 12: Comment noted. The "area of concern" is not part of the SOI and does not establish any specific timing expectation for a future SOI expansion or annexation and would not alter the conclusions of the EIR.

REFERENCES

Longmire, Sam. 2013. Northern Sierra Air Management District. E-mail communications with PMC staff.

3.0 ERRATA

3.1 INTRODUCTION

This section includes minor edits to the Draft EIR. These modifications resulted from response to comments received during the Draft EIR public review period and Nevada County LAFCo staff edits.

Revisions herein do not result in new significant environmental impacts and do not constitute significant new information, nor do they alter the conclusions of the environmental analysis. Changes are provided in revision marks (underline for new text and ~~strikeout~~ for deleted text).

3.2 CHANGES AND EDITS TO THE DRAFT EIR

ES EXECUTIVE SUMMARY

The following text has been modified in Draft EIR Section ES, page ES-1:

> The District currently serves approximately 12,500 water customers and 13,000 electricity customers. The electricity department owns and operates approximately ~~133~~ 135 miles of primary overhead and ~~82~~ 83 miles of primary underground electrical distribution circuits. Power is provided through 4 electrical substations and one distribution metering point ~~and 15 distribution circuits throughout~~ and is distributed from 17 distribution circuits throughout the greater Truckee area.

1.0 INTRODUCTION

The following text has been modified in Draft EIR Section 1.0, page 1.0-1:

> The Truckee Donner Public Utility District (TDPUD; District) is a multicounty special district that provides water and electric utility services. The current TDPUD Sphere of Influence boundary, which was established in 1983~~, with the Nevada County portion~~ and updated in 1998 (Nevada County portion only), encompasses most of the lands within the Town of Truckee and adjacent unincorporated areas of Nevada and Placer counties.

2.0 PROJECT DESCRIPTION

The following text has been modified in Draft EIR Section 2.0, page 2.0-1:

> The electricity department owns and operates approximately ~~133~~ 135 miles of primary overhead and ~~82~~ 83 miles of primary underground electrical distribution circuits. Power is provided through 4 electrical substations and one distribution metering point ~~and 15 distribution circuits throughout~~ and is distributed from 17 distribution circuits throughout the greater Truckee area.

The following text has been modified in Draft EIR Section 2.0, page 2.0-1:

> The TDPUD also provides power to the western portion of the Glenshire community through a distribution feed that is shared with NV Energy ~~(also known as California Pacific Electric Company, LLC (CalPeco) dba Liberty Utilities)~~.

The following text has been revised in DEIR Section 2.0, page 2.0-2:

> The current SOI for the TDPUD was established in 1983~~,~~ and ~~the Nevada County portion was~~ updated in 1998 (Nevada County portion only).

The following text has been revised in DEIR Section 2.0, page 2.0-2:

> ~~The TDPUD electric service SOI was determined to be almost conterminous with the TDPUD's electric service area; thus, the electrical service area is somewhat smaller than the District's boundaries as it does not include the eastern portion of Glenshire.~~

The following text change is made to Draft EIR page 2.0-5, fourth paragraph:

> The LAFCo-recommended SOI for the TDPUD is described below and includes distinct sphere boundaries for each of the District's services. In general, the LAFCo-recommended SOI does not include areas that are not expected or anticipated to require District services. As required by Commission policy, the LAFCo-recommended SOI defines the probable boundary of the agency's service area 20 years hence (the long-term horizon) as well as a near-term development horizon for lands likely to be annexed prior to the next sphere review or update (typically within five years). The SOI also designates an area of concern to indicate an area in which the land use actions of one agency may have impact on another. The LAFCo-recommended SOI is based on the *TDPUD Review Draft Sphere of Influence Update and Municipal Service Review*.

The following text has been revised in DEIR Section 2.0, page 2.0-6:

> Area 6: Includes properties owned by Union Pacific Railroad in Placer County south of Donner Lake following the route of the rail line. In late 2010, Union Pacific Railroad (UPR) requested the TDPUD to provide electric service to certain new communication facilities which UPR was installing within the electric service territory then operated by Sierra. Sierra agreed to the TDPUD's request on the basis that because of the location of the required incremental service for UPR and the location of the respective existing electric facilities of the TDPUD and Sierra, the most cost-effective way to build the facilities necessary to serve the incremental UPR load would be for the TDPUD to build the facilities. Sierra's permission to allow the TDPUD to install new facilities to service UPR does not relate to the comparative ability of Sierra (and now CalPeco) and the TDPUD to provide electric service with existing facilities to the 3-square-mile Northstar area, the 25.5-square-mile area north of Truckee, or any other area which is assessed with this EIR. ~~Union Pacific Railroad (UPR) has requested service, Liberty Utilities has agreed to allow the District to provide service, and the California Public Utilities Commission (CPUC) has given Liberty Utilities its approval. In 2012, the District applied to Placer LAFCo for annexation of these properties.~~

Figure 2.0-2 in DEIR Section 2.0, page 2.0-7 has been modified and is presented on the following page.

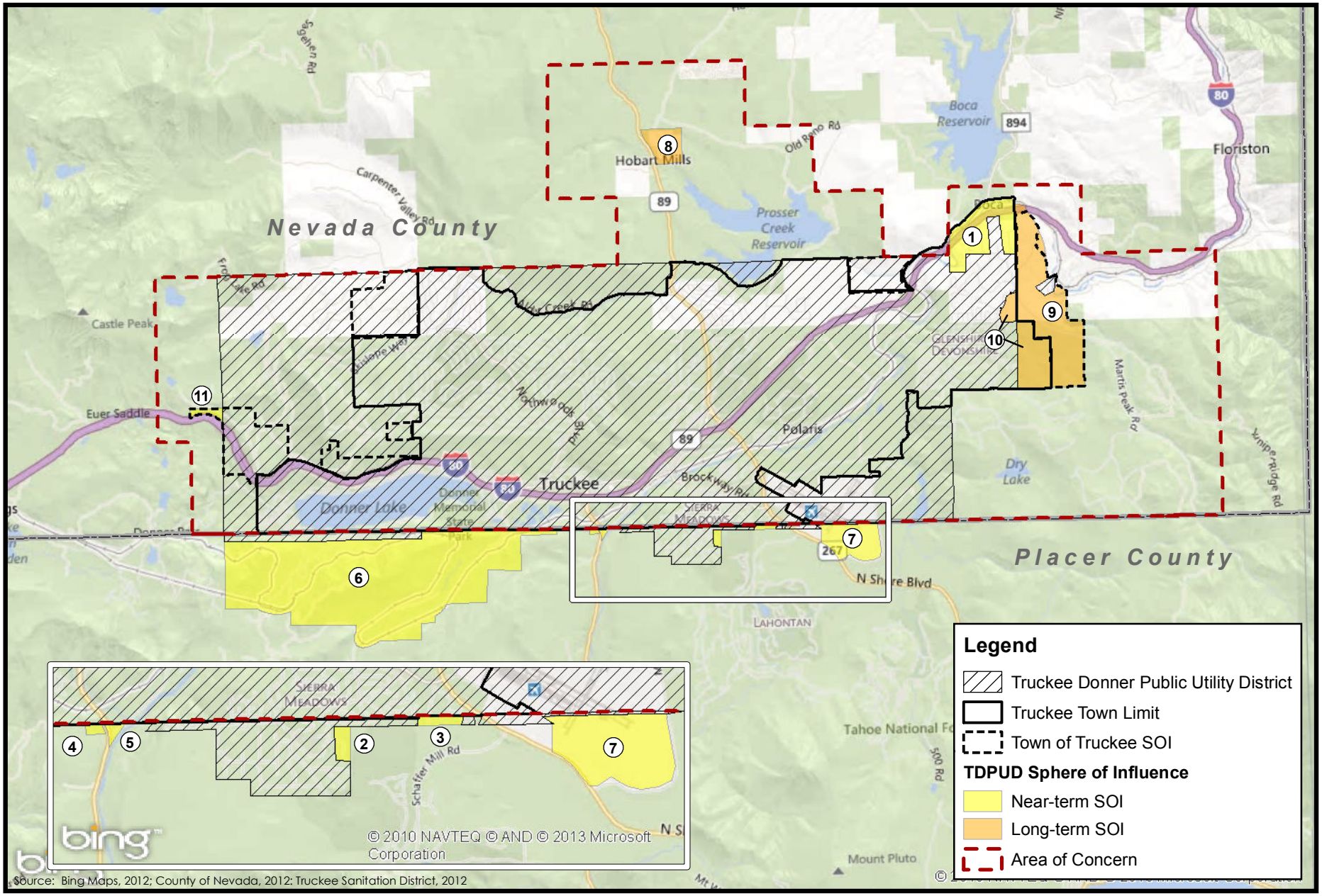


Figure 2.0-2
LAFCo Recommended Sphere of Influence

PMC

3.1 LAND USE

The following text changes are made to mitigation measure MM 3.1.1 on Draft EIR page 3.1-11:

> Should Nevada County LAFCo wish to adopt the TDPUD-preferred Sphere of Influence for electric and water service, the sphere of influence plan shall include a policy that annexations will be approved only when water and/or electrical services are needed to serve development consistent with the land use designation of the subject territory ~~indicates development potential that requires the support of water and/or electrical service~~. Current TDPUD District Code 5.53.010.2 states, "No service shall be provided without prior annexation approval from the appropriate LAFCo."

3.2 CLIMATE CHANGE AND GREENHOUSE GAS EMISSIONS

Since circulation of the Draft EIR, updated data was applied to completely revise Draft EIR Section 3.2, Climate Change and Greenhouse Gases (see **Appendix A**). The revised Draft EIR Section 3.2, Climate Change and Greenhouse Gases, identified as **Appendix A** is considered to completely replace the original analysis in the Draft EIR, which is presented as **Appendix B** for comparison purposes.

3.3 SECONDARY ENVIRONMENTAL EFFECTS OF THE PROJECT

No revisions.

4.0 ALTERNATIVES

The following text changes are made to the Draft EIR page 4.0-11:

> Based on the evaluation described in this section, the No Project Alternative would have less adverse environmental impacts than the LAFCo-recommended SOI and the TDPUD-preferred SOI for electric and water services and would be the environmentally superior alternative. However, the No Project Alternative would not meet the primary objective of the proposed project, which is implementation of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. Alternatives 2 though 4 would provide environmental benefits in comparison with the TDPUD-preferred SOI for electrical service. Beyond the No Project Alternative, Draft EIR Table 4.0-1 identifies that the LAFCo-recommended SOI option have the least environmental impacts and would be environmentally superior alternative of all the options and alternatives evaluated.

5.0 LONG-TERM IMPLICATIONS OF THE PROJECT

No revisions.

6.0 REPORT PREPARERS

No revisions.

APPENDICES

APPENDIX A-REVISED 3.2
CLIMATE CHANGE AND GREENHOUSE GASES

This section of the Draft EIR provides a discussion of the proposed project's effect on greenhouse gas emissions and the associated effects of climate change. The California Environmental Quality Act (CEQA) requires that lead agencies consider the reasonably foreseeable adverse environmental effects of projects they are considering for approval.

3.2.1 EXISTING SETTING

EXISTING CLIMATE SETTING

Since the early 1990s, scientific consensus holds that the world's population is releasing greenhouse gases faster than the earth's natural systems can absorb them. These gases are released as byproducts of fossil fuel combustion, waste disposal, energy use, land-use changes, and other human activities. This release of gases, such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O), creates a blanket around the earth that allows light to pass through but traps heat at the surface preventing its escape into space. While this is a naturally occurring process known as the greenhouse effect, human activities have accelerated the generation of greenhouse gases beyond natural levels. The overabundance of greenhouse gases in the atmosphere has led to an unexpected warming of the earth and has the potential to severely impact the earth's climate system.

While often used interchangeably, there is a difference between the terms "climate change" and "global warming." According to the National Academy of Sciences, climate change refers to any significant, measurable change of climate lasting for an extended period of time that can be caused by both natural factors and human activities. Global warming, on the other hand, is an average increase in the temperature of the atmosphere caused by increased greenhouse gas emissions. The use of the term climate change is becoming more prevalent because it encompasses all changes to the climate, not just temperature.

To fully understand global climate change, it is important to recognize the naturally occurring greenhouse effect and to define the greenhouse gases that contribute to this phenomenon. Various gases in the earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space and a portion of the radiation is absorbed by the earth's surface. The earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. Greenhouse gases, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are CO_2, CH_4, N_2O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).

Table 3.2-1 provides descriptions of the primary greenhouse gases attributed to global climate change, including a description of their physical properties, primary sources, and contribution to the greenhouse effect.

TABLE 3.2-1
GREENHOUSE GASES

Greenhouse Gas	Description
Carbon dioxide (CO_2)	Carbon dioxide is a colorless, odorless gas. CO_2 is emitted in a number of ways, both naturally and through human activities. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, industrial facilities, and other sources. The atmospheric lifetime of CO_2 is variable because it is so readily exchanged in the atmosphere.[1]
Methane (CH_4)	Methane is a colorless, odorless gas that is not flammable under most circumstances. CH_4 is the major component of natural gas, about 87 percent by volume. It is also formed and released to the atmosphere by biological processes occurring in anaerobic environments. Methane is emitted from a variety of both human-related and natural sources. Human-related sources include fossil fuel production, animal husbandry (intestinal fermentation in livestock and manure management), rice cultivation, biomass burning, and waste management. These activities release significant quantities of methane to the atmosphere. Natural sources of methane include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and other sources such as wildfires. Methane's atmospheric lifetime is about 12 years.[2]
Nitrous oxide (N_2O)	Nitrous oxide is a clear, colorless gas with a slightly sweet odor. N_2O is produced by both natural and human-related sources. Primary human-related sources of N_2O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, adipic acid production, and nitric acid production. N_2O is also produced naturally from a wide variety of biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N_2O is approximately 120 years.[3]
Hydrofluorocarbons (HFCs)	Hydrofluorocarbons are man-made chemicals, many of which have been developed as alternatives to ozone-depleting substances for industrial, commercial, and consumer products. The atmospheric lifetime for HFCs varies from just over a year for HFC-152a to 260 years for HFC-23. Most of the commercially used HFCs have atmospheric lifetimes less than 15 years (e.g., HFC-134a, which is used in automobile air conditioning and refrigeration, has an atmospheric life of 14 years).[4]
Perfluorocarbons (PFCs)	Perfluorocarbons are colorless, highly dense, chemically inert, and nontoxic. There are seven PFC gases: perfluoromethane (CF_4), perfluoroethane (C_2F_6), perfluoropropane (C_3F_8), perfluorobutane (C_4F_{10}), perfluorocyclobutane (C_4F_8), perfluoropentane (C_5F_{12}), and perfluorohexane (C_6F1_4). Natural geological emissions have been responsible for the PFCs that have accumulated in the atmosphere in the past; however, the largest current source is aluminum production, which releases CF_4 and C_2F_6 as byproducts. The estimated atmospheric lifetimes for CF_4 and C_2F_6 are 50,000 and 10,000 years, respectively.[4,5]
Sulfur hexafluoride (SF_6)	Sulfur hexafluoride is an inorganic compound that is colorless, odorless, nontoxic, and generally nonflammable. SF_6 is primarily used as an electrical insulator in high voltage equipment. The electric power industry uses roughly 80 percent of all SF_6 produced worldwide. Significant leaks occur from aging equipment and during equipment maintenance and servicing. SF_6 has an atmospheric life of 3,200 years.[4]

Sources: [1]EPA 2011a, [2]EPA 2011b, [3]EPA 2010a, [4]EPA 2010b, [5]EFCTC 2003

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. Gases with high global warming potential, such as HFCs, PFCs, and SF_6, are the most heat-absorbent. Methane traps over 21 times more heat per molecule than CO_2, and N_2O absorbs 310 times more heat per molecule than CO_2. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO_2e), which weight each gas by its global warming potential (GWP). Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted. **Table 3.2-2** shows the GWPs for different greenhouse gases for a 100-year time horizon.

TABLE 3.2-2
GLOBAL WARMING POTENTIAL FOR GREENHOUSE GASES

Greenhouse Gas	Global Warming Potential
Carbon dioxide (CO_2)	1
Methane (CH_4)	21
Nitrous oxide (N_2O)	310
Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs)	6,500
Sulfur hexafluoride (SF_6)	23,900

Source: California Climate Action Registry 2009

As the name implies, global climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern, respectively. California is a significant emitter of CO_2 in the world and produced 477 million gross metric tons of carbon dioxide equivalent in 2008 (CARB 2010a). Consumption of fossil fuels in the transportation sector was the single largest source of California's GHG emissions in 2008, accounting for 36.4 percent of total GHG emissions in the state (CARB 2010a). This category was followed by the electric power sector (including both in-state and out-of-state sources) (24.3 percent) and the industrial sector (19.3 percent) (CARB 2010a).

EFFECTS OF GLOBAL CLIMATE CHANGE

California can draw on substantial scientific research conducted by experts at various state universities and research institutions. With more than a decade of concerted research, scientists have established that the early signs of climate change are already evident in the state—as shown, for example, in increased average temperatures, changes in temperature extremes, reduced snowpack in the Sierra Nevada, sea level rise, and ecological shifts.

Many of these changes are accelerating—locally, across the country, and around the globe. As a result of emissions already released into the atmosphere, California is anticipated to face intensifying climate changes in coming decades (CNRA 2009a). Generally, research indicates that California should expect overall hotter and drier conditions with a continued reduction in winter snow (with concurrent increases in winter rains), as well as increased average temperatures, and accelerating sea-level rise. In addition to changes in average temperatures, sea level, and precipitation patterns, the intensity of extreme weather events is also changing (CNRA 2009a).

Climate change temperature projections identified in the 2009 California Climate Adaptation Strategy suggest the following (CNRA 2009a):

- Average temperature increase is expected to be more pronounced in the summer than in the winter season.
- Inland areas are likely to experience more pronounced warming than coastal regions.
- Heat waves are expected to increase in frequency, with individual heat waves also showing a tendency toward becoming longer, and extending over a larger area, thus more likely to encompass multiple population centers in California at the same time.
- As GHGs remain in the atmosphere for decades, temperature changes over the next 30 to 40 years are already largely determined by past emissions. By 2050, temperatures are projected to increase by an additional 1.8 to 5.4°F (an increase one to three times as large as that which occurred over the entire 20th century).
- By 2100, the models project temperature increases between 3.6 and 9°F.

Precipitation levels are expected to change over the 21st century, though models differ in determining where and how much rain and snowfall patterns may change (CNRA 2009a). Eleven out of 12 precipitation models run by the Scripps Institution of Oceanography suggest a small to significant (12–35 percent) overall decrease in precipitation levels by mid-century (CNRA 2009a). In addition, higher temperatures increase evaporation and make for a generally drier climate, as higher temperatures hasten snowmelt. Moreover, the 2009 California Climate Adaptation Strategy concludes that more precipitation may fall as rain rather than as snow, with important implications for water management in the state. California communities have largely depended on runoff from yearly established snowpack to provide the water supplies during the warmer, drier months of late spring, summer, and early autumn. With rainfall and meltwater running off earlier in the year, the state may face increasing challenges of storing the water for the dry season while protecting Californians downstream from floodwaters during the wet season.

According to the 2009 California Climate Adaptation Strategy, the impacts of climate change in California have the potential to include, but are not limited to, the areas discussed in **Table 3.2-3**.

TABLE 3.2-3
POTENTIAL STATEWIDE IMPACTS FROM CLIMATE CHANGE

Potential Statewide Impact	Description
Public Health	Climate change is expected to lead to an increase in ambient (i.e., outdoor) average air temperature, with greater increases expected in summer than in winter months. Larger temperature increases are anticipated in inland communities as compared to the California coast. The potential health impacts from sustained and significantly higher than average temperatures include heat stroke, heat exhaustion, and the exacerbation of existing medical conditions such as cardiovascular and respiratory diseases, diabetes, nervous system disorders, emphysema, and epilepsy. Numerous studies have indicated that there are generally more deaths during periods of sustained higher temperatures, and these are due to cardiovascular causes and other chronic diseases. The elderly, infants, and socially isolated people with pre-existing illnesses who lack access to air conditioning or cooling spaces are among the most at risk during heat waves.

Potential Statewide Impact	Description
Floods and Droughts	The impacts of flooding can be significant. Results may include population displacement, severe psychosocial stress with resulting mental health impacts, exacerbation of pre-existing chronic conditions, and infectious disease. Additionally, impacts can range from a loss of personal belongings, and the emotional ramifications from such loss, to direct injury and/or mortality. Drinking water contamination outbreaks in the United States are associated with extreme precipitation events. Runoff from rainfall is also associated with coastal contamination that can lead to contamination of shellfish and contribute to food-borne illness. Floodwaters may contain household, industrial, and agricultural chemicals as well as sewage and animal waste. Flooding and heavy rainfall events can wash pathogens and chemicals from contaminated soils, farms, and streets into drinking water supplies. Flooding may also overload storm and wastewater systems, or flood septic systems, also leading to possible contamination of drinking water systems. Drought impacts develop more slowly over time. Risks to public health that Californians may face from drought include impacts on water supply and quality, food production (both agricultural and commercial fisheries), and risks of waterborne illness. As surface water supplies are reduced as a result of drought conditions, the amount of groundwater pumping is expected to increase to make up for the water shortfall. The increase in groundwater pumping has the potential to lower the water tables and cause land subsidence. Communities that utilize well water will be adversely affected by drops in water tables or through changes in water quality. Groundwater supplies have higher levels of total dissolved solids compared to surface waters. This introduces a set of effects for consumers, such as repair and maintenance costs associated with mineral deposits in water heaters and other plumbing fixtures, and on public water system infrastructure designed for lower salinity surface water supplies. Drought may also lead to increased concentration of contaminants in drinking water supplies.
Water Resources	The state's water supply system already faces challenges to provide water for California's growing population. Climate change is expected to exacerbate these challenges through increased temperatures and possible changes in precipitation patterns. The trends of the last century—especially increases in hydrologic variability—will likely intensify in this century. The state can expect to experience more frequent and larger floods and deeper droughts. Rising sea level will threaten the Delta water conveyance system and increase salinity in near-coastal groundwater supplies. Planning for and adapting to these simultaneous changes, particularly their impacts on public safety and long-term water supply reliability, will be among the most significant challenges facing water and flood managers this century.
Forests and Landscapes	Global climate change has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, wildfire occurrence statewide could increase from 57 percent to 169 percent by 2085. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks will not be uniform throughout the state.

Source: CNRA 2009a

3.2.2 REGULATORY FRAMEWORK

The adoption of recent legislation has provided a clear mandate that climate change must be included in an environmental review for a project subject to CEQA. Several GHG emission–related laws and regulations are provided as follows.

FEDERAL REGULATION AND THE CLEAN AIR ACT

In the past, the US Environmental Protection Agency (EPA) has not regulated greenhouse gases under the Clean Air Act (CAA) because it asserted that the act did not authorize the EPA to issue mandatory regulations to address global climate change and that such regulation would be unwise without an unequivocally established causal link between GHGs and the increase in global surface air temperatures. However, the US Supreme Court held that the EPA must consider regulation of motor vehicle GHG emissions. In *Massachusetts v. Environmental Protection Agency et al.*, twelve states and cities, including California, together with several environmental organizations, sued to require the EPA to regulate GHGs as pollutants under the Clean Air Act (127 S. Ct. 1438 [2007]). The US Supreme Court held that the EPA was authorized by the Clean Air Act to regulate CO_2 emissions from new motor vehicles. The Court did not mandate that the EPA enact regulations to reduce GHG emissions, but found that the only instances in which the EPA could avoid taking action were if it found that GHG emissions do not contribute to climate change or if it offered a "reasonable explanation" for not determining that GHG emissions contribute to climate change.

On December 7, 2009, the EPA issued an "endangerment finding" under the Clean Air Act, concluding that GHG emissions threaten the public health and welfare of current and future generations and that motor vehicles contribute to GHG pollution (EPA 2009). These findings provide the basis for adopting new national regulations to mandate GHG emission reductions under the federal Clean Air Act. The EPA's endangerment finding paves the way for federal regulation of GHG emissions.

It was expected that Congress would enact GHG legislation, primarily for a cap-and-trade system. However, proposals circulated in both the House of Representatives and the Senate were controversial, and it may be some time before Congress adopts major climate change legislation. Under the Consolidated Appropriations Act of 2008 (HR 2764), Congress has established mandatory GHG reporting requirements for some emitters of greenhouse gases. In addition, on September 22, 2009, the EPA issued the Final Mandatory Reporting of Greenhouse Gases Rule. The rule requires annual reporting to the EPA of GHG emissions from large sources and suppliers of greenhouse gases, including facilities that emit 25,000 metric tons or more a year of GHGs.

The following discussion summarizes the EPA's recent regulatory activities with respect to various types of GHG sources.

EPA and National Highway Traffic Safety Administration Joint Rulemaking for Vehicle Standards

In response to the *Massachusetts v. EPA* ruling discussed above, the Bush Administration issued an Executive Order on May 14, 2007, directing the EPA, the Department of Transportation (DOT), and the Department of Energy (DOE) to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008.

On October 10, 2008, the National Highway Traffic Safety Administration (NHTSA) released a final environmental impact statement analyzing proposed interim standards for passenger cars and

light trucks in model years 2011 through 2015. The NHTSA issued a final rule for model year 2011 on March 30, 2009 (NHSTA 2009).

On May 7, 2010, the EPA and the NHTSA issued a final rule regulating fuel efficiency and GHG pollution from motor vehicles for cars and light-duty trucks for model years 2012–2016 (EPA 2010c). On May 21, 2010, President Obama issued a memorandum to the Secretaries of Transportation and Energy, and to the Administrators of the EPA and the NHTSA, calling for the establishment of additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the EPA and the NHTSA issued a Supplemental Notice of Intent announcing plans to propose stringent, coordinated federal greenhouse gas and fuel economy standards for model year 2017–2025 light-duty vehicles. The agencies proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. California has announced its support of this national program. The final rule was adopted in October 2012, and the NHTSA intends to set standards for model years 2022–2025 in a future rulemaking.

Fuel Efficiency Standards for Heavy-Duty Engines and Vehicles

In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the EPA and the NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks, which apply to vehicles from model years 2014–2018. Both the EPA and the NHTSA have adopted standards for CO_2 emissions and fuel consumption, respectively, tailored to each of three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this program will reduce GHG emissions and fuel consumption for affected vehicles by 6 percent to 23 percent.

Energy Independence and Security Act

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. Among other key measures, the act would do the following, which would aid in the reduction of national GHG emissions, both mobile and non-mobile:

1) Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.

2) Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

3) While superseded by the NHTSA and EPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."

Voluntary Programs

The EPA administers a variety of voluntary programs and partnerships with GHG emitters in which the Environmental Protection Agency partners with industries that produce and utilize synthetic gases to reduce emissions of particularly potent GHG emissions. For example, the EPA's National Clean Diesel Campaign (NCDC) promotes diesel emission reduction strategies. The NCDC works to reduce the pollution emitted from diesel engines across the country through the implementation of varied control strategies by working with manufacturers, fleet operators, air quality professionals, environmental and community organizations, and state and local officials to reduce diesel emissions. NCDC activities include developing new emissions standards for locomotive and marine diesel engines, and promoting the reduction of emissions for existing diesel engines, including use of cleaner fuels, retrofitting and repairing existing fleets, and idling reduction, among others. The EPA also administers the State and Local Climate and Energy Program, which provides technical assistance, analytical tools, and outreach support to state, local, and tribal governments.

Other Applicable Regulations and Policies

In addition to the federal regulations and programs described above, there are still more policies and programs to address climate change. A database compiled by the International Energy Agency lists more than 300 policies and measures addressing climate change in the United States.

STATE REGULATION

California has adopted various administrative initiatives and also enacted a variety of legislation relating to climate change, much of which sets aggressive goals for GHG emissions reductions within the state. However, none of this legislation provides definitive direction regarding the treatment of climate change in the environmental review documents prepared under CEQA. In particular, the amendments to the CEQA Guidelines do not require or suggest specific methodologies for performing an assessment or thresholds of significance and do not specify greenhouse gas reduction mitigation measures. Instead, the CEQA amendments continue to rely on lead agencies to choose methodologies and make significance determinations based on substantial evidence, as discussed in further detail below. In addition, no state agency has promulgated binding regulations for analyzing GHG emissions, determining their significance, or mitigating any significant effects in CEQA documents. Thus, lead agencies exercise their discretion determining how to analyze greenhouse gases.

The discussion below provides a brief overview of California Air Resources Board (CARB) and Office of Planning and Research (OPR) documents and of the primary legislation relating to climate change that may affect the emissions associated with the proposed project. It begins with an overview of the primary regulatory acts that have driven GHG regulation and analysis in California.

Executive Order S-3-05 (Statewide GHG Targets)

California Executive Order S-03-05 (June 1, 2005) mandates a reduction of GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. Although the 2020 target has been incorporated into legislation (AB 32), the 2050 target remains only a goal of the Executive Order.

Assembly Bill 32, the California Global Warming Solutions Act of 2006

The California Global Warming Solutions Act of 2006 (AB 32) 32 (Health and Safety Code Sections 38500, 38501, 28510, 38530, 38550, 38560, 38561–38565, 38570, 38571, 38574, 38580, 38590, 38592–38599) was signed into law in September 2006 after considerable study and expert testimony before the legislature. The law instructs CARB to develop and enforce regulations for the reporting and verifying of statewide GHG emissions. The act directed CARB to set a GHG emissions limit based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. Based on CARB's calculation of 1990 baseline emissions levels, California must reduce GHG emissions by approximately 29 percent below "business-as-usual" predictions of year 2020 GHG emissions to achieve this goal.

The bill required CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions. CARB accomplished the key milestones set forth in AB 32, including the following:

- June 30, 2007. Identification of discrete early action GHG emissions reduction measures. On June 21, 2007, CARB satisfied this requirement by approving three early action measures. These were later supplemented by adding six other discrete early action measures.

- January 1, 2008. Identification of the 1990 baseline GHG emissions level, approval of a statewide limit equivalent to that level, and adoption of reporting and verification requirements concerning GHG emissions. On December 6, 2007, CARB approved a statewide limit on GHG emissions levels for the year 2020 consistent with the determined 1990 baseline.

- January 1, 2009. Adoption of a scoping plan for achieving GHG emission reductions. On December 11, 2008, CARB adopted the Climate Change Scoping Plan: A Framework for Change (Scoping Plan), discussed in more detail below.

- January 1, 2010. Adoption and enforcement of regulations to implement the "discrete" actions. Several early action measures have been adopted and became effective on January 1, 2010.

- January 1, 2011. Adoption of GHG emissions limits and reduction measures by regulation. On October 28, 2010, CARB released its proposed cap-and-trade regulations, which would cover sources of approximately 85 percent of California's GHG emissions (CARB 2010b). CARB's board ordered CARB's executive director to prepare a final regulatory package for cap and trade on December 16, 2010.

- January 1, 2012. GHG emissions limits and reduction measures adopted in 2011 become enforceable.

AB 32 Scoping Plan

As noted above, on December 11, 2008, CARB adopted the Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be

adopted to reduce California's GHG emissions. CARB determined that achieving the 1990 emission level would require a reduction of GHG emissions of approximately 29 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business as usual"). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program. Additional development of these measures and adoption of the appropriate regulations will occur through the end of year 2013. The key elements of the Scoping Plan include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewables energy mix of 33 percent;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions;
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets;
- Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, heavy-duty truck measures, and the Low Carbon Fuel Standard; and
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation (CARB 2008a).

In 2009, a coalition of special interest groups brought a challenge to the Scoping Plan alleging that it violated AB 32 and that the environmental review document (called a "Functional Equivalent Document") violated CEQA by failing to appropriately analyze alternatives to the proposed cap-and-trade program. On May 20, 2011, the San Francisco Superior Court entered a final judgment ordering that CARB take no further action with respect to cap-and-trade rulemaking until it complies with CEQA. While CARB disagrees with the trial court finding and appealed the decision on May 23, 2011, in order to remove any doubt about the matter and in keeping with CARB's interest in public participation and informed decision-making, CARB revisited the alternatives. The revised analysis includes the five alternatives included in the original environmental analysis: a "no project" alternative (that is, taking no action at all); a plan relying on a cap-and-trade program for the sectors included in a cap; a plan relying more on source-specific regulatory requirements with no cap-and-trade component; a plan relying on a carbon fee or tax; and a plan relying on a variety of proposed strategies and measures. The public hearing to consider approval of the AB 32 Scoping Plan Functional Equivalent Document and the AB 32 Scoping Plan was held on August 24, 2011. On this date, CARB re-approved the Scoping Plan.

In August 2012, CARB released revised estimates of the expected 2020 emissions reductions. The revised analysis relies on emissions projections updated in light of current economic forecasts which account for the economic downturn since 2008 as well as reduction measures already approved and put in place. This reduced the projected 2020 emissions from 596 million metric tons (MMT) CO_2e to 545 $MMTCO_2e$. The reduction in projected 2020 emissions means that the

revised business-as-usual (BAU) reduction necessary to achieve AB 32's goal of reaching 1990 levels by 2020 is now only 21 percent.

Assembly Bill 1493

Assembly Bill 1493 ("the Pavley Standard" or AB 1493) (Health and Safety Code Sections 42823 and 43018.5) required CARB to adopt regulations by January 1, 2005, to reduce GHG emissions from noncommercial passenger vehicles and light-duty trucks of model year 2009 through 2016. The bill also required the California Climate Action Registry to develop and adopt protocols for the reporting and certification of GHG emissions reductions from mobile sources for use by CARB in granting emissions reduction credits. The bill authorizes CARB to grant emissions reduction credits for reductions in GHG emissions prior to the date of enforcement of regulations, using model year 2000 as the baseline for reduction.

In 2004, CARB applied to the EPA for a waiver under the federal Clean Air Act to authorize implementation of these regulations. The waiver request was formally denied by the EPA in December 2007 after California filed suit to prompt federal action. In January 2008, the California Attorney General filed a new lawsuit against the EPA for denying California's request for a waiver to regulate and limit GHG emissions from these vehicles. In January 2009, President Barack Obama issued a directive to the EPA to reconsider California's request for a waiver. On June 30, 2009, the EPA granted the waiver to California for its GHG emission standards for motor vehicles. As part of this waiver, the EPA specified the provision that CARB may not hold a manufacturer liable or responsible for any noncompliance caused by emission debits generated by a manufacturer for the 2009 model year. CARB has adopted a new approach to passenger vehicles—cars and light trucks—by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California. These standards will apply to all passenger and light-duty trucks used by customers, employees of, and deliveries to the proposed project.

Low Carbon Fuel Standard

Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average fuel carbon intensity (CI) for transportation fuels in California regulated by CARB. CARB identified the Low Carbon Fuel Standard (LCFS) as a discrete early action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009. In 2009, CARB approved for adoption of the LCFS regulation, which became fully effective in April 2010 and is codified at Title 17, California Code of Regulations, Sections 95480–95490. The Low Carbon Fuel Standard will reduce greenhouse gas emissions by reducing the CI of transportation fuels used in California by at least 10 percent by 2020. CI is a measure of the GHG emissions associated with the various production, distribution, and use steps in the "life cycle" of a transportation fuel.

On December 29, 2011, the US District Court for the Eastern District of California issued several rulings in the federal lawsuits challenging the LCFS. One of the district court's rulings preliminarily enjoined CARB from enforcing the regulation. In January 2012, CARB appealed that decision to the Ninth Circuit Court of Appeals and then moved to stay the injunction pending resolution of the appeal. On April 23, 2012, the Ninth Circuit granted CARB's motion for a stay of the injunction while it continues to consider CARB's appeal of the lower court's decision.

Clean Cars

In January 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model years 2017–2025. The program combines the control of smog, soot, and GHG emissions with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.

Senate Bill 375

SB 375 (codified at Government Code and Public Resources Code[1]), signed in September 2008, provides for a new planning process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 will be implemented over the next several years and includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development. SB 375 also requires Metropolitan Planning Organizations (MPOs) to incorporate a "sustainable communities strategy" (SCS) in their regional transportation plans (RTPs) that will achieve GHG emission reduction targets by reducing vehicle miles traveled from light-duty vehicles through the development of more compact, complete, and efficient communities.

SB 375 is similar to the Regional Blueprint Planning Program, established by the California Department of Transportation, which provides discretionary grants to fund regional transportation and land use plans voluntarily developed by MPOs working in cooperation with councils of governments. The Scoping Plan relies on the requirements of SB 375 to implement the carbon emissions reductions anticipated from land use decisions.

California Building Energy Efficiency Standards

Energy conservation standards for new residential and commercial buildings were originally adopted by the California Energy Resources Conservation and Development Commission in June 1977 and most recently revised in 2008 (Title 24, Part 6 of the California Code of Regulations (CCR)). In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11, Title 24) was adopted as part of the California Building Standards Code (Title 24, California Code of Regulations). Part 11 establishes voluntary standards on planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. Some of these standards have become mandatory in the 2010 edition of the Part 11 code. Current mandatory standards include:

- Twenty (20) percent mandatory reduction in indoor water use, with voluntary goal standards for 30, 35, and 40 percent reductions

- Separate water meters for nonresidential buildings' indoor and outdoor water use, with a requirement for moisture-sensing irrigation systems for larger landscape projects

[1] Senate Bill 375 is codified at Government Code Sections 65080, 65400, 65583, 65584.01, 65584.02, 65584.04, 65587, 65588, 14522.1, 14522.2, and 65080.01 as well as Public Resources Code Sections 21061.3 and 21159.28 and Chapter 4.2.

- Diversion of 50 percent of construction waste from landfills, increasing voluntarily to 65 and 75 percent for new homes and 80 percent for commercial projects

- Mandatory inspections of energy systems (i.e., heat furnace, air conditioner, mechanical equipment) for nonresidential buildings over 10,000 square feet to ensure that all are working at their maximum capacity according to their design efficiencies

- Low-pollutant emitting interior finish materials such as paints, carpet, vinyl flooring, and particle board

The California Energy Commission has opened a public process and rulemaking proceeding for the adoption of changes to the 2013 Building Energy Efficiency Standards contained in the California Code of Regulations, Title 24, Part 6 (also known as the California Energy Code) and associated administrative regulations in Part 1 (collectively referred to here as the standards). The proposed amended standards will be adopted in 2014. The 2013 Building Energy Efficiency Standards are 25 percent more efficient than previous standards for residential construction and 30 percent better for nonresidential construction. The standards, which take effect on January 1, 2014, will offer builders better windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

Renewables Portfolio Standard (Senate Bill 1078, Senate Bill 107, and Senate Bill X1-2)

Established in 2002 under SB 1078, and accelerated in 2006 under SB 107 and again in 2011 under SBX1-2, California's Renewables Portfolio Standard (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020. The 33 percent standard is consistent with the RPS goal established in the Scoping Plan. As interim measures, the RPS requires 20 percent of retail sales to be sourced from renewable energy by 2013, and 25 percent by 2016. Initially, the RPS provisions applied to investor-owned utilities, community choice aggregators, and electric service providers. SBX1-2 added, for the first time, publicly owned utilities to the entities subject to the RPS. However, local publicly owned electric utilities, such as the Truckee Donner Public Utility District (TDPUD), are required to implement a Renewables Portfolio Standard, but are given flexibility in developing utility-specific targets, timelines, and resource eligibility rules (CEC 2008). The expected growth in the RPS to meet the standards in effect in 2008 is not reflected in the BAU calculation in the AB 32 Scoping Plan. In other words, the Scoping Plan's 2020 business as usual does not take credit for implementation of the RPS that occurred after its adoption.

LOCAL

Northern Sierra Air Quality Management District

The project is under jurisdiction of the Northern Sierra Air Quality Management District (NSAQMD), which regulates air quality according to the standards established in the federal and state Clean Air Acts and amendments to those acts. The NSAQMD comprises three contiguous, mountainous, rural counties in northeastern California (Nevada, Sierra, and Plumas counties) and regulates air quality through its permitting authority and through air quality–related planning and review activities over most types of stationary emission sources.

The NSAQMD has not yet established significance thresholds for greenhouse gas emissions from project operations.

3.2.3 IMPACTS AND MITIGATION MEASURES

STANDARDS OF SIGNIFICANCE

Per Appendix G of the State CEQA Guidelines, impacts related to climate change are considered significant if implementation of the proposed project would result in any of the following:

1) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

2) Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

To meet the GHG emission targets of AB 32, California would need to generate less GHG emissions in the future than current levels. It is recognized, however, that for most projects there is no simple metric available to determine if a single project would substantially increase or decrease overall GHG emission levels or conflict with the goals of AB 32. Preliminary guidance from the Office of Planning and Research (OPR) and recent letters from the Attorney General critical of CEQA documents that have taken different approaches indicate that lead agencies should calculate, or estimate, emissions from vehicular traffic, energy consumption, water conveyance and treatment, waste generation, and construction activities.

Addressing GHG generation impacts requires an agency to make a determination as to what constitutes a significant impact. The amendments to the CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine if a project's GHG emissions will have a "significant" impact on the environment. The guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions (14 CCR Section 15064.4(a)).

In its Final Statement of Reasons for Regulatory Action (FSOR) accompanying the CEQA Amendments, the California Natural Resources Agency (CNRA 2009b) explains that quantification of GHG emissions "is reasonably necessary to ensure an adequate analysis of GHG emissions using available data and tools" and that "quantification will, in many cases, assist in the determination of significance." However, as explained in the FSOR, the revised Section 15064.4(b) assigns lead agencies the discretion to determine the methodology to quantify GHG emissions. The FSOR also notes that CEQA case law has long stated that "there is no iron-clad definition of 'significance.' Accordingly, lead agencies must use their best efforts to investigate and disclose all that they reasonably can concerning a project's potential adverse impacts."

Determining a threshold of significance for a project's climate change impacts poses a special difficulty for lead agencies. Much of the science in this area is new and is evolving constantly. At the same time, neither the state nor local agencies are specialized in this area, and there are currently no local, regional, or state thresholds for determining whether the proposed project has a significant impact on climate change. The CEQA Amendments do not prescribe specific significance thresholds but instead leave considerable discretion to lead agencies to develop appropriate thresholds to apply to projects within their jurisdiction.

As noted earlier, AB 32 is a legal mandate requiring that statewide GHG emissions be reduced to 1990 levels by 2020. In adopting AB 32, the legislature determined the necessary GHG reductions for the state to make in order to sufficiently offset its contribution to the cumulative

climate change problem to reach 1990 levels. AB 32 is the only legally mandated requirement for the reduction of greenhouse gases. As such, compliance with AB 32 is the adopted basis upon which the agency can base its significance threshold for evaluating the project's GHG impacts. Significance thresholds for GHG emissions resulting from land use development projects have not been established in Nevada County. In June 2010, the Bay Area Air Quality Management District (BAAQMD) published its GHG thresholds.[2] Utilization of the BAAQMD's GHG thresholds has been considered reasonable and appropriate by NSAQMD staff (Longmire 2013).

For the proposed project, the BAAQMD service population ratio threshold of 4.6 metric tons of CO_2e per service population (residents plus employees) per year is used as the significance threshold concerning project generation of GHG emissions since this threshold was prepared with the purpose of project-level compliance with the requirements of AB 32 and achieving the goals of the AB 32 Scoping Plan. The project would be considered to have a significant impact if the projected emissions would surpass 4.6 metric tons of CO_2e per service population (residents plus employees) per year. The proposed project would also be considered to have a significant impact if it would directly conflict with the AB 32 goals for reducing GHG emissions. In addition to comparing projected GHG emissions to the significance threshold, this analysis evaluates the project's potential to result in a significant GHG impact by determining its consistency with the AB 32 Scoping Plan and Senate Bill 2X (Renewables Portfolio Standard), which both require 33 percent of supply from renewable energy sources by 2020. As stated previously, the AB 32 Scoping Plan contains the main strategies California is implementing to achieve reduction of 169 MMT of CO_2e, or approximately 30 percent from the State's projected 2020 emissions level of 596 MMT of CO_2e under a business-as-usual scenario.

METHODOLOGY

As stated above, the NSAQMD does not currently have an adopted threshold of significance for GHG emissions. In June 2010, the BAAQMD published its GHG thresholds in which projects resulting in more than 4.6 metric tons of CO_2e per service population per year are considered to result in a significant impact (BAAQMD 2011). (The BAAQMD has also published GHG thresholds for proposed general plans in which plans resulting in more than 6.6 metric tons of CO_2e per service population per year are considered to result in a significant impact.) The BAAQMD thresholds were chosen based on the substantial evidence that such thresholds represent quantitative and/or qualitative levels of GHG emissions, compliance with which means that the environmental impact of the GHG emissions will normally not be cumulatively considerable under CEQA (BAAQMD 2011). Compliance with such thresholds will be part of the solution to the cumulative GHG emissions problem, rather than hinder the State's ability to meet its goals of reduced statewide GHG emissions under AB 32. For the purposes of evaluating the proposed project's GHG impacts, emissions resulting from the potential extent of growth that could be supported upon future annexation of the two different SOIs proposed will be quantified and compared to the BAAQMD threshold of 4.6 metric tons of CO_2e per service population annually.

[2] The thresholds the BAAQMD adopted were called into question by a minute order issued January 9, 2012, in *California Building Industry Associated v. BAAQMD*, Alameda Superior Court Case No RG10548693. On March 5, 2012, the Alameda County Superior Court issued a judgment finding that the BAAQMD had failed to comply with CEQA when it adopted the thresholds. The court did not determine whether the thresholds were valid on the merits, but found that the adoption of the thresholds was a project under CEQA. The court issued a writ of mandate ordering the BAAQMD to set aside the thresholds and cease dissemination of them until the BAAQMD had complied with CEQA. The claim made in the case concerned the CEQA impacts of adopting the thresholds; that is, how the thresholds would affect land use development patterns. Those issues are not relevant to the scientific soundness of the BAAQMD's analysis of what levels of pollutants should be deemed significant, or the threshold to use in assessing any air quality-related impact the project would have on the existing environment. These thresholds are based on substantial evidence identified in Appendix D of the Guidelines and are therefore used in this analysis.

The project itself will also be compared with the strategies identified in the AB 32 Scoping Plan for a determination of consistency. This analysis evaluates the project's potential to result in a significant GHG impact by determining its consistency with the strategies contained in the AB 32 Scoping Plan and the Renewables Portfolio Standard, which both require 33 percent of supply from renewable energy sources by 2020. In terms of electric service, since the proposed lands in the proposed SOI expansion under the District-preferred SOI scenario are currently within the service area of the energy provider Liberty Utilities CalPeco, electrical use demand and electrical use–related GHG emissions are quantified for the maximum growth development potential of all proposed lands in the SOI expansion accounting for geographic location and the emission intensity factor for both Liberty Utilities CalPeco and the TDPUD. In other words, for the purposes of projecting electrical energy demand and related GHG emissions that would result from the District-preferred SOI boundary, energy-source-derived emissions generated from the maximum growth development potential of the proposed SOI expansion under the District-preferred SOI scenario are quantified in consideration of both Liberty Utilities CalPeco as the service provider and the TDPUD as the service provider.

The resultant GHG emissions of proposed project implementation were calculated using the California Emissions Estimator Model (CalEEMod), version 2011.1.1, computer program (see **Appendix 3.2-A**). The electrical service of the TDPUD will be compared with the strategies identified in the AB 32 Scoping Plan for a determination of consistency, specifically Strategy E-3, Renewables Portfolio Standard (33 percent by 2020), which as previously stated requires 33 percent of supply from renewable energy sources by 2020. Specifically, the TDPUD's ability to comply with Strategy E-3 is evaluated in consideration of accommodating buildout of the proposed lands in the SOI expansion.

IMPACTS AND MITIGATION MEASURES

GHG Emissions (Standard of Significance 1)

Impact 3.2.1 The proposed project could result in a net increase in greenhouse gas emissions and could result in a significant impact on the environment. This impact is **cumulatively considerable.**

GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. The combination of GHG emissions from past, present, and future projects contributes substantially to the phenomenon of global climate change and its associated environmental impacts and as such is addressed only as a cumulative impact.

It is important to note that neither of the proposed scenarios—LAFCo-recommended or District-preferred—would specifically implement or directly result in the construction of any new facilities. Neither Nevada County LAFCo nor the TDPUD has any land use regulatory authority. The jurisdiction for land use matters for all of the land areas within the proposed SOIs would remain with either the Town of Truckee, Nevada County, Sierra County, or Placer County, and neither Nevada County LAFCo nor the TDPUD has the authority to facilitate future development in a manner different than is currently outlined by these jurisdictions in their applicable general plans. Furthermore, GHG emissions are already being generated by current land use activities.

LAFCo-Recommended Truckee Donner Public Utility District Sphere of Influence

Electric and Water Service

Table 3.3-3 in Section 3.3 of this DEIR identifies the extent of growth potential in the LAFCo-recommended SOI (near term and long term). The total development potential shown in **Table 3.3-3** does not factor existing development. It should be noted that some of this growth (rural development) could occur without the proposed update of the SOIs given that electric and water service can also be provided through wells or the Placer County Water Agency (Placer County only) and electrical service by private company service providers.

For the purposes of projecting GHG emissions that could result from the LAFCo-recommended SOI boundary, emissions generated from the maximum growth potential in the LAFCo-recommended SOI (near term and long term) are quantified.[3] Estimated GHG emissions resulting from these activities are summarized in **Table 3.2-4**.

TABLE 3.2-4
ESTIMATED GREENHOUSE GAS EMISSIONS – MAXIMUM GROWTH POTENTIAL IN LAFCO-RECOMMENDED SPHERE OF INFLUENCE (METRIC TONS PER YEAR)

Emissions Source	Carbon Dioxide (CO_2)	Methane (CH_4)	Nitrous Oxide (N_2O)	CO_2e
Area Source (landscaping, hearth)	1,967	0.82	0.08	2,010
Energy (electricity generation and natural gas)	3,754	0.13	0.06	3,777
Mobile	20,957	1.31	0.00	20,985
Waste	2,611	154	0.00	5,851
Water	1,854	33.34	0.85	2,819
Total	**31,144**	**190**	**1**	**35,441**

*Source: CalEEMod version 2011.1.1. The extent of growth potential in the LAFCo-recommended SOI (near term and long term) is projected at 839 residential units, 209,000 square feet of industrial building space, and 97,000 square feet of commercial building space per **Table 3.3-3** in Section 3.3. See **Appendix 3.2-1** for emission model outputs.*

Table 3.2-5 depicts the projected GHG emissions per service population for the project. The service population associated with the growth potential in the LAFCo-recommended SOI (near term and long term) was determined by estimating the number of potential residents and employees that would be accommodated with realization of the maximum growth potential in the LAFCo-recommended SOI. According to the Energy Information Administration (EIA; 1995), there is an average of one employee per 1,750 square feet of industrial building space and one employee per 900 square feet of commercial building space. Applying these ratios to the industrial and commercial square footage growth potential in the LAFCo-recommended SOI (near term and long term) results in 227 potential employees (209,000 square feet of industrial building space ÷ 1,750 = 119 and 97,000 square feet of commercial building space ÷ 900 = 108. 119 + 108 = 227). According to the California State Department of Finance (DOF; 2012), the

[3] No aspect of the proposed project would specifically implement or directly result in the construction of any new facilities. Neither Nevada County LAFCo nor the TDPUD has any land use regulatory authority. The jurisdiction for land use matters for all of the land areas within the proposed SOIs would remain with either the Town of Truckee, Nevada County, Sierra County, or Placer County, and neither Nevada County LAFCo nor the TDPUD has the authority to facilitate future development in a manner different than is currently outlined by these jurisdictions in their applicable general plans.

average residential unit in the region houses 2.5 persons. The application of this ratio to the residential unit growth potential in the LAFCo-recommended SOI (near term and long term) equals 2,097 potential residents (839 x 2.5 = 2,097).

TABLE 3.2-5
LAFCO-RECOMMENDED TDPUD SPHERE OF INFLUENCE
GREENHOUSE GAS EMISSIONS PER SERVICE POPULATION

	Emissions	Jobs	Population	Service Population (SP)	$MTCO_2e$/SP/Year
Growth Potential in the LAFCo-Recommended SOI (Near Term and Long Term)	35,441	227	2,097	2,324	15.2

Based on the population and employment figures shown in **Table 3.2-5**, the projected service population associated with the maximum growth potential within the LAFCo-recommended SOI would be 2,324. Dividing the GHG emissions (35,441 metric tons) for this maximum growth potential yields a metric ton per service population ratio of 15.2.

District-Preferred Truckee Donner Public Utility District Sphere of Influence

Electric and Water Service

As previously described, the District-preferred SOI boundary proposes to maintain most of the area of the existing TDPUD SOI for electric service in conjunction with an expansion of 3 square miles at the southeast corner of the existing SOI in Placer County (Northstar Load), the expansion of 25.5 square miles north of the existing SOI in Nevada County and Sierra County (Hobart Mills Load, Russell Valley Load, and Stampede Reservoir Generation Facility), and the reduction of 8 square miles of the existing SOI at its eastern edge in Nevada County (**Figure 2.0-3**). The District-preferred SOI for water service proposes to maintain the current SOI for water services. Therefore, the District-preferred SOI boundary for water service would result in no change compared with the current SOI, and there is no potential for an expansion of water service facilities into any areas that have not been previously planned for development.

Tables 3.3-4 and **3.3-5** in Section 3.3 of this DEIR identify the extent of growth potential in the District-preferred SOI. The total development potential shown in these tables does not factor existing development. It should be noted that some of this growth (rural development) could occur without the proposed update of the SOIs given that electric and water service can also be provided through wells or the Placer County Water Agency (Placer County only) and electrical service by private company service providers.

For the purposes of projecting GHG emissions that could result from the District-preferred SOI boundary, emissions generated from the maximum growth potential in the District-preferred SOI are quantified based on the SOI for electric services as it is the largest SOI of the two, in addition to the 8 square miles of the existing SOI at its eastern edge in Nevada County which is proposed to be retained in the District-preferred SOI boundary for water service.[4] Estimated GHG emissions resulting from these activities are summarized in **Table 3.2-6**.

[4] No aspect of the proposed project would specifically implement or directly result in the construction of any new facilities. Neither Nevada County LAFCo nor the TDPUD has any land use regulatory authority. The jurisdiction for land use matters for all of the land areas within the proposed SOIs would remain with either the Town of Truckee, Nevada County,

TABLE 3.2-6
ESTIMATED GREENHOUSE GAS EMISSIONS – MAXIMUM GROWTH POTENTIAL IN DISTRICT-PREFERRED SPHERE OF INFLUENCE (METRIC TONS PER YEAR)

Emissions Source	Carbon Dioxide (CO_2)	Methane (CH_4)	Nitrous Oxide (N_2O)	CO_2e
Area Source (landscaping, hearth)	32,750	14	1.36	33,459
Energy (electricity generation and natural gas)	51,826	2	0.88	52,139
Mobile	275,126	17	0.00	275,483
Waste	4,617	272	0.00	10,347
Water	3,947	61	1.56	5,708
Total	**368,266**	**366**	**3.80**	**377,136**

*Source: CalEEMod version 2011.1.1. The extent of growth potential in the District-preferred SOI for electric service is projected at 13,908 residential units, 530,500 square feet of commercial building space, 209,000 square feet of industrial building space, and 44,600 square feet of office building space per **Table 3.3-4** and **3.3-5** in Section 3.3. The 8 square miles of the existing SOI at its eastern edge in Nevada County which is proposed to be retained in the District-preferred SOI boundary for water service, yields an additional 59 residential units of growth potential. See **Appendix 3.2-1** for emission model outputs.*

Table 3.2-7 depicts the projected GHG emissions per service population for the project. The service population associated with the growth potential in the District-preferred SOI was determined by estimating the number of potential residents and employees that would be accommodated with realization of the maximum growth potential in the District-preferred SOI. According to the EIA (1995), there is an average of one employee per 1,750 square feet of industrial building space, one employee per 900 square feet of commercial building space, and one employee per 387 square feet of office building space. Applying these ratios to the industrial, commercial, and office square footage growth potential in the District-preferred SOI results in 823 potential employees (209,000 square feet of industrial building space ÷ 1,750 = 119; 530,500 square feet of commercial building space ÷ 900 = 589; and 44,600 square feet of office building space ÷ 387 = 115. 119 + 589 + 115 = 823). According to the DOF (2012), the average residential unit in region houses 2.5 persons. The application of this ratio to the residential unit growth potential in the District-preferred SOI equals 34,917 potential residents (13,967 x 2.5 = 34,917).

TABLE 3.2-7
DISTRICT-PREFERRED SPHERE OF INFLUENCE
GREENHOUSE GAS EMISSIONS PER SERVICE POPULATION

	Emissions	Jobs	Population	Service Population (SP)	$MTCO_2e$/SP/Year
Growth Potential in District-Preferred SOI	377,136	342	34,917	35,740	10.5

Based on the population and employment figures shown in **Table 3.2-7**, the projected service population associated with the maximum growth potential within the District-preferred SOI would

Placer County, or Sierra County, and neither Nevada County LAFCo nor the TDPUD has the authority to facilitate future development in a manner different than is currently outlined by these jurisdictions in their applicable general plans.

be 35,740. Dividing the GHG emissions for this maximum growth potential yields a metric ton per service population ratio of 10.5.

Summary of Environmental Effects of Greenhouse Gas Emissions for Both SOI Scenarios

As shown, realization of the maximum growth potential of both the LAFCo-recommended SOI and the District-preferred SOI would exceed the BAAQMD threshold of 4.6 metric tons of CO_2e per service population. Therefore, both the LAFCo-recommended SOI and the District-preferred SOI could result in a net increase in cumulative GHG emissions. The potential contribution to greenhouse gases is thus considered **cumulatively considerable** and is a **significant and unavoidable** impact.

Mitigation Measures

While the new SOIs would not result in any new growth-related environmental impacts or an increased severity of the above identified significant environmental impacts (similar finding to CEQA Guidelines Section 15162), establishment of a new SOI is the first step in a series of actions that support this planned growth. With the exception of not updating the SOI, there are no feasible mitigation measures available to Nevada County LAFCo to address this impact. Therefore, it would remain **significant and unavoidable**.

AB 32 Compliance (Standard of Significance 2)

Impact 3.2.2 Implementation of the proposed project could result in a net increase in greenhouse gas emissions, yet would not conflict with the goals of AB 32, and thus would not result in a significant impact on the environment. This impact is **less than cumulatively considerable.**

The project is considered to have a significant impact if it would be in conflict with the AB 32 goals for reducing GHG emissions. In December 2008, CARB approved the AB 32 Scoping Plan outlining the State's strategy to achieve the 2020 GHG emissions limit. This Scoping Plan, developed by CARB in coordination with the Climate Action Team, proposes a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce dependence on oil, diversify California's energy sources, save energy, create new jobs, and enhance public health. The Scoping Plan contains a list of 39 recommended actions contained in plan Appendices C and E. This list is also provided in **Table 3.2-8**.

TABLE 3.2-8
RECOMMENDED ACTIONS OF CLIMATE CHANGE SCOPING PLAN

Measure Number	Measure Description
Transportation	
T-1	Pavley I and II – Light-Duty Vehicle Greenhouse Gas Standards
T-2	Low Carbon Fuel Standard (Discrete Early Action)
T-3	Regional Transportation-Related Greenhouse Gas Targets
T-4	Vehicle Efficiency Measures
T-5	Ship Electrification at Ports (Discrete Early Action)

Measure Number	Measure Description
T-6	Goods Movement Efficiency Measures. Ship Electrification at Ports System-Wide Efficiency Improvements
T-7	Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Measure – Aerodynamic Efficiency (Discrete Early Action)
T-8	Medium- and Heavy-Duty Vehicle Hybridization
T-9	High-Speed Rail
Electricity and Natural Gas	
E-1	Energy Efficiency (32,000 GWh of Reduced Demand) Increased Utility Energy Efficiency Programs More Stringent Building and Appliance Standards Additional Efficiency and Conservation Programs
E-2	Increase Combined Heat and Power Use by 30,000 GWh (net reductions include avoided transmission line loss)
E-3	Renewables Portfolio Standard (33% by 2020)
E-4	Million Solar Roofs (including California Solar Initiative, New Solar Homes Partnership, and solar programs of publicly owned utilities) Target of 3000 MW Total Installation by 2020
CR-1	Energy Efficiency (800 Million Therms Reduced Consumption) Utility Energy Efficiency Programs Building and Appliance Standards Additional Efficiency and Conservation Programs
CR-2	Solar Water Heating (AB 1470 goal)
Green Buildings	
GB-1	Green Buildings
Water	
W-1	Water Use Efficiency
W-2	Water Recycling
W-3	Water System Energy Efficiency
W-4	Reuse Urban Runoff
W-5	Increase Renewable Energy Production
W-6	Public Goods Charge (Water)
Industry	
I-1	Energy Efficiency and Co-Benefits Audits for Large Industrial Sources
I-2	Oil and Gas Extraction GHG Emission Reduction
I-3	GHG Leak Reduction from Oil and Gas Transmission
I-4	Refinery Flare Recovery Process Improvements
I-5	Removal of Methane Exemption from Existing Refinery Regulations
Recycling and Waste Management	

Measure Number	Measure Description
RW-1	Landfill Methane Control (Discrete Early Action)
RW-2	Additional Reductions in Landfill Methane Increase the Efficiency of Landfill Methane Capture
RW-3	High Recycling/Zero Waste Commercial Recycling Increase Production and Markets for Compost Anaerobic Digestion Extended Producer Responsibility Environmentally Preferable Purchasing
Forests	
F-1	Sustainable Forest Target
High Global Warming Potential (GWP) Gases	
H-1	Motor Vehicle Air Conditioning Systems: Reduction of Refrigerant Emissions from Non-Professional Services (Discrete Early Action)
H-2	SF_6 Limits in Non-Utility and Non-Semiconductor Applications (Discrete Early Action)
H-3	Reduction of Perfluorocarbons in Semiconductor Manufacturing (Discrete Early Action)
H-4	Limit High GWP Use in Consumer Products Discrete Early Action (Adopted June 2008)
H-5	High GWP Reductions from Mobile Sources Low GWP Refrigerants for New Motor Vehicle Air Conditioning Systems Air Conditioner Refrigerant Leak Test During Vehicle Smog Check Refrigerant Recovery from Decommissioned Refrigerated Shipping Containers Enforcement of Federal Ban on Refrigerant Release During Servicing or Dismantling of Motor Vehicle Air Conditioning Systems
H-6	High GWP Reductions from Stationary Sources High GWP Stationary Equipment Refrigerant Management Program: Refrigerant Tracking/Reporting/Repair Deposit Program Specifications for Commercial and Industrial Refrigeration Systems Foam Recovery and Destruction Program SF Leak Reduction and Recycling in Electrical Applications Alternative Suppressants in Fire Protection Systems Residential Refrigeration Early Retirement Program
H-7	Mitigation Fee on High GWP Gases
Agriculture	
A-1	Methane Capture at Large Dairies

The strategies included in the Scoping Plan that apply to all future development, including the maximum development potential in both the LAFCo-recommended SOI and the District-preferred SOI, are contained in **Table 3.2-9**, which also summarizes the extent to which future development in Nevada County, Placer County, Sierra County, and the Town of Truckee would comply with the strategies to help California reach emissions reduction targets.

TABLE 3.2-9
AB 32 COMPLIANCE

Strategy	Project Compliance
Energy Efficiency Measures	
Energy Efficiency Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities). **Renewable Portfolio Standard** Achieve a 33 percent renewable energy mix statewide by 2020. **Green Building Strategy** Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Compliant** All future development in California, including that associated with the maximum development potential of both the LAFCo-recommended SOI and the District-preferred SOI, will comply with the updated Title 24 standards, including the new 2010 California Building Code (CBC), for building construction. These standards require new buildings to reduce water consumption by 20 percent, which results in less energy consumption for pumping water.
Water Conservation and Efficiency Measures	
Water Use Efficiency Continue efficiency programs and use cleaner energy sources to move and treat water. Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions.	**Compliant** As stated, all future development in California, including that associated with the maximum development potential of both the LAFCo-recommended SOI and the District-preferred SOI, will comply with the updated Title 24 standards, including the new 2010 California Building Code (CBC), for building construction. These standards require new buildings to reduce water consumption by 20 percent, which results in less energy consumption for pumping water.
Transportation and Motor Vehicle Measures	
Vehicle Climate Change Standards AB 1493 (Pavley) required the State to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles and light-duty trucks. Regulations were adopted by CARB in September 2004. **Light-Duty Vehicle Efficiency Measures** Implement additional measures that could reduce light-duty GHG emissions. For example, measures to ensure that tires are properly inflated can both reduce GHG emissions and improve fuel efficiency. **Adopt Heavy- and Medium-Duty Fuel and Engine Efficiency Measures** Regulations to require retrofits to improve the fuel efficiency of heavy-duty trucks that could include devices that reduce aerodynamic drag and rolling resistance. This measure could also include hybridization of and increased engine efficiency of vehicles. **Low Carbon Fuel Standard** CARB identified this measure as a Discrete Early Action Measure. This measure would reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020.	**Compliant** The project does not involve the manufacture of vehicles. However, vehicles that are purchased and used within the project site would comply with any vehicle and fuel standards that CARB adopts.

Strategy	Project Compliance
Regional Transportation-Related Greenhouse Gas Targets Develop regional GHG emissions reduction targets for passenger vehicles. Local governments will play a significant role in the regional planning process to reach passenger vehicle GHG emissions reduction targets. Local governments have the ability to directly influence both the siting and design of new residential and commercial developments in a way that reduces GHGs associated with vehicle travel.	**Compliant** Specific regional emission targets for transportation emissions do not directly apply to this project; regional GHG reduction target development is outside the scope of this project. The project will comply with any plans developed in Nevada County.
Measures to Reduce High Global Warming Potential (GWP) Gases CARB has identified Discrete Early Action measures to reduce GHG emissions from the refrigerants used in car air conditioners, semiconductor manufacturing, and consumer products. CARB has also identified potential reduction opportunities for future commercial and industrial refrigeration, changing the refrigerants used in auto air conditioning systems, and ensuring that existing car air conditioning systems do not leak.	**Compliant** New products used or serviced on the industrial land uses would comply with future CARB rules and regulations.
Forests	
Urban Forestry A statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	**Compliant** All future development associated with the maximum development potential of both the LAFCo-recommended SOI and the District-preferred SOI within unincorporated Nevada County will comply with Section L-II 4.2, Community Design Standards, of the Nevada County Municipal Code. These design standards provide design interpretations for commercial, industrial, and residential development that address landscaping requirements. All future development associated with the maximum development potential of both the LAFCo-recommended SOI and the District-preferred SOI within Placer County will comply with the Placer County Landscape Design Guidelines. There is no development potential associated with the proposed SOI in Sierra County, as it is the County's intent to confine the extension of development-serving public facilities to Community Core Areas and Community Influence Areas in Sierra County. Areas outside the Community Core Areas or Community Influence Areas are intended to be maintained for natural resources. All future development associated with the maximum development potential of both the LAFCo-recommended SOI and the District-preferred SOI within the Town of Truckee will comply with Chapter 18.40, Landscape Standards, which provides standards for the location and types of landscaping to be provided in various areas of proposed developments, including setbacks, disturbed areas, parking areas, along streets, along property lines, and in buffer areas between incompatible uses. These standards also provide incentives for the preservation of native plants and trees.

Strategy	Project Compliance
Recycling and Waste Management	
High Recycling/Zero Waste Achieve 50 percent statewide Recycling Goal: Achieving the state's 50 percent waste diversion mandate as established by the Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy-intensive material extraction and production as well as methane emission from landfills.	**Compliant** All future development associated with the maximum development potential of both the LAFCo-recommended SOI and the District-preferred SOI is required to divert 50 percent of all solid waste from landfill facilities.

LAFCo-Recommended Truckee Donner Public Utility District Sphere of Influence

The LAFCo-recommended SOI boundary omits lands in public ownership and those areas not expected or anticipated to be developed. The LAFCo-recommended boundary for the District's SOI would encompass an area that includes the Town of Truckee as well as developed areas adjacent to the town, which are under the jurisdiction of either Nevada County or Placer County (see **Figure 2.0-2**).

All future development associated with the maximum development potential of the LAFCo-recommended SOI would be subject to all applicable California state regulatory requirements, which would also reduce the GHG emissions. As shown in **Table 3.2-9,** future development would comply with the strategies to help California reach its emissions reduction targets.

District-Preferred Truckee Donner Public Utility District Sphere of Influence

As previously described, the District-preferred SOI boundary proposes to maintain most of the area of the existing TDPUD SOI for electric service in conjunction with an expansion of 3 square miles at the southeast corner of the existing SOI in Placer County (Northstar Load), the expansion of 25.5 square miles north of the existing SOI in Nevada County and Sierra County (Hobart Mills Load, Russell Valley Load, and Stampede Reservoir Generation Facility), and the reduction of 8 square miles of the existing SOI at its eastern edge in Nevada County (**Figure 2.0-3**). The development potential of the District-preferred SOI boundary for water service are less than the maximum growth potential of the District-preferred SOI for electric service, thus the GHG emissions associated with the proposed electric service SOI was utilized in the analysis below. All future development associated with the maximum development potential of the District-preferred SOI would be subject to all applicable California state regulatory requirements. As shown in **Table 3.2-9,** future development would comply with the strategies to help California reach its GHG emissions reduction targets.

As previously stated, in terms of electric service, the lands in the proposed SOI expansion under the District-preferred SOI scenario are currently within the service area of the energy provider, Liberty Utilities CalPeco. Therefore, for the purposes of this analysis, electrical use consumption and electrical use–related GHG emissions were quantified for the maximum growth potential of all proposed lands in the SOI expansion under the District-preferred SOI scenario accounting for geographic location and the emission intensity factor for both Liberty Utilities CalPeco and the TDPUD. Both Liberty Utilities CalPeco's ability and the TDPUD's ability to comply with AB 32 Scoping Plan Strategy E-3, Renewables Portfolio Standard, were evaluated in consideration of accommodating the maximum growth potential of the proposed lands in the SOI expansion. In other words, for the intent of projecting electrical energy consumption and related GHG emissions that would result from the District-preferred SOI boundary, energy-source-derived

emissions generated from the maximum growth development potential of the proposed SOI expansion under the District-preferred SOI scenario are quantified in consideration of both Liberty Utilities CalPeco as the service provider and the TDPUD as the service provider.[5]

Tables 3.3-3 and **3.3-4** in Section 3.3 of this DEIR identify the extent of growth potential in the District-preferred SOI for both electric service and water service. The total development potential shown in these tables does not factor existing development. Estimated electrical energy use and related electrical energy-use emissions resulting from these activities are summarized in **Tables 3.2-10** and **3.2-11**.

Table 3.2-10 identifies electrical energy use and associated GHG emissions for the maximum growth potential in the District-preferred SOI assuming Liberty Utilities CalPeco, the current service provider for these areas, remains the electrical service provider.

TABLE 3.2-10
MAXIMUM GROWTH POTENTIAL IN DISTRICT-PREFERRED SOI
ELECTRICAL ENERGY CONSUMPTION AND GREENHOUSE GAS EMISSIONS (METRIC TONS PER YEAR) – LIBERTY UTILITIES CALPECO AS SERVICE PROVIDER

Land Use Buildout Assumptions[1]	Electrical Energy Consumption (KWh)	CO_2e (metric tons annually)[2]
• 13,967 residential units • 530,500 square feet of commercial building space • 209,000 square feet of industrial building space • 44,600 square feet of office building space	95,230,021	61,808

*Notes: Electrical Energy consumption and emissions quantified by PMC with CalEEMod (see **Appendix 3.2-A**). Quantified electrical energy consumption and emissions do not include snowmaking activities or emissions from natural gas consumption.*
*[1] Maximum growth potential assumptions derived from **Tables 3.3-4** and **3.3-5** of Section 3.3.*
[2] Emission intensity factor sourced from Liberty Utilities CalPeco (Smart 2013).

Table 3.2-11 identifies electrical energy use and associated GHG emissions for the maximum potential growth in the District-preferred SOI assuming the TDPUD as the electrical service provider, as proposed under the District-preferred SOI boundary scenario.

[5] No aspect of the proposed project would specifically implement or directly result in the construction of any new facilities. Neither Nevada County LAFCo nor the TDPUD has any land use regulatory authority. The jurisdiction for land use matters for all of the land areas within the proposed SOIs would remain with either the Town of Truckee, Nevada County, Sierra County, or Placer County, and neither Nevada County LAFCo nor the TDPUD has the authority to facilitate future development in a manner different than is currently outlined by these jurisdictions in their applicable general plans.

TABLE 3.2-11
MAXIMUM GROWTH POTENTIAL IN DISTRICT-PREFERRED SOI
ELECTRICAL ENERGY CONSUMPTION AND GREENHOUSE GAS EMISSIONS (METRIC TONS PER YEAR) –
TRUCKEE DONNER PUBLIC UTILITY DISTRICT AS SERVICE PROVIDER

Land Use Buildout Assumptions[1]	Electrical Energy Consumption (KWh)	CO_2e (metric tons annually)[2]
• 13,967 residential units • 530,500 square feet of commercial building space • 209,000 square feet of industrial building space • 44,600 square feet of office building space	95,230,021	31,758

*Notes: Electrical Energy consumption and emissions quantified by PMC with CalEEMod (see **Appendix 3.2-A**). Quantified electrical energy consumption and emissions do not include snowmaking activities or emissions from natural gas consumption.*
*[1] Maximum growth potential assumptions derived from **Tables 3.3-4** and **3.3-5** of Section 3.3.*
[2] Emission intensity factor sourced from the TDPUD (Neus 2013).

As shown in **Table 3.2-10**, under the current electric energy provider, Liberty Utilities CalPeco, the maximum growth potential in the District-preferred SOI results in an annual electrical energy consumption of 95,230,021 kilowatt-hours as well as 61,808 metric tons of CO_2e. As shown in **Table 3.2-11**, under the proposed District-preferred SOI boundary, the maximum growth potential in the District-preferred SOI would result in an annual electrical energy consumption of 95,230,021 kilowatt-hours and 31,758 metric tons of CO_2e.

Table 3.2-12 identifies the most recently available electric energy information of both Liberty Utilities CalPeco and the TDPUD as well as the current renewable energy mix for each utility company. As stated in Section 2.0, Project Description, the TDPUD currently serves approximately 13,000 electricity customers, and according to the California Public Utility Commission (CPUC; 2012a), Liberty Utility CalPeco currently serves approximately 49,000 customers in California.

TABLE 3.2-12
TOTAL ELECTRIC ENERGY CONSUMPTION AND RENEWABLE ENERGY MIX –
LIBERTY UTILITIES CALPECO AND TRUCKEE DONNER PUBLIC UTILITY DISTRICT

Electric Service Provider	Total Energy Consumption (Annual KWh)	Renewable Energy Mix Percentage	Renewable KWh Annually
Liberty Utilities CalPeco (current provider)	6,433,570,000[1]	20%[1]	1,286,714,000
TDPUD	156,478,000[2]	37%[2]	57,896,860

Sources: [1] Liberty Utilities CalPeco (Smart 2013). [2] Truckee Donner Public Utilities District (Neus 2013).

As shown in **Table 3.2-12**, Liberty Utilities CalPeco delivered 6,433,570,000 kilowatt-hours over the course of one year, of which 20 percent was supplied from renewable energy sources. The TDPUD delivered 156,478,000 kilowatt-hours over the course of one year, of which 37 percent was supplied from renewable energy sources.

As previously stated, the TDPUD proposes to expand its SOI. The expansion of the TDPUD's electrical service area to include the lands within the District-preferred SOI could potentially add the need to provide an additional 95,230,021 kilowatt-hours of electricity annually. Adding this total to the amount the TDPUD delivered in 2012 (156,478,000 kilowatt-hours) would equal 251,708,021 kilowatt-hours. Such an immediate addition of energy consumption would reduce the TDPUD's current

renewable energy mix percentage to 23 percent. In the case of Liberty Utilities CalPeco, such an immediate addition of energy consumption would reduce its current renewable energy mix percentage to 19.7 percent. However, such a scenario is not likely, if not outright impossible, since the majority of the lands within the proposed SOI expansion area are not developed and are not anticipated to be developed at any time in the immediate future.

The Renewables Portfolio Standard program requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020. According to the CEC (2011), the TDPUD is projected to sell 176,383,000 kilowatt-hours of electricity annually by the year 2020 and is expected to be able to deliver approximately 72,619,000 kilowatt-hours of renewable energy annually by the year 2020. Therefore, under this CEC projection, the potential for the TDPUD to supply the additional energy consumption, under the District-preferred SOI boundary, of 95,230,021 kilowatt-hours to its projected 2020 deliveries would result in a TDPUD renewable energy mix of 29 percent (176,383,000 + 95,230,021 = 251,924,923; 72,619,000 ÷ 251,924,923 = 0.29), which is 4 percentage points below the mandated 33 percent or 10,516,224 kilowatt-hours of renewable energy, based on projections. However, CEC projections only account for existing (2012) contract or operating utility-owed projects. It is noted that the TDPUD is perpetually seeking and successfully executing contracts relating to its procurement of renewable energy. The TDPUD projects that it will be able to satisfy its requirements under the Renewables Portfolio Standard program in 2020 and has disclosed its own projection of delivering a 40 percent renewable energy mix in 2020.

The purchase power contract involving Liberty Utilities CalPeco's supply of electricity to its California customers guarantees the delivery of a specific and minimum verifiable amount of renewable energy (Smart 2012). The amount of guaranteed renewable energy for 2012 and 2013 is 20 percent (Smart 2012). The amount of renewable energy mix supplied to Liberty Utilities CalPeco's California customers in 2014 is set at 21.7 percent, and in 2015 the renewable mix percentage is contractually set at 23.3 percent (Smart 2012). A new renewable energy mix requirements contract has yet to be established for years beyond 2015. While Liberty Utilities CalPeco has yet to execute any contracts relating to its procurement of Renewables Portfolio Standard–eligible energy for the years beyond 2015, Liberty Utilities CalPeco is actively exploring its options and is confident that it will be able to enter the necessary commercial arrangements to satisfy its requirements under the Renewables Portfolio Standard program in 2016 and in the ensuing years (Smart 2013).

The CPUC implements and administers the Renewables Portfolio Standard program in collaboration and cooperation with the CEC and other agencies. The CPUC and the CEC monitor Renewables Portfolio Standard goals and results, including compliance reviews and enforcement, as necessary (CPUC 2011). These entities also require that electrical service providers prepare a renewable energy procurement plan and update that plan when necessary (CPUC 2011). The CPUC and the CEC review Renewables Portfolio Standard procurement plans for each electric utility provider and accept, reject, or modify the plans. Also, the CPUC and the CEC oversee electrical utility providers' Renewables Portfolio Standard solicitations for renewable energy, review the results of solicitations submitted for approval by an electrical utility, and accept or reject proposed contracts based on consistency with the approved procurement plan.

Both the TDPUD and Liberty Utilities CalPeco, as electric service providers, are overseen, through the requirement of submitting renewable energy procurement plans, by the CPUC and the CEC. In addition, the Renewables Portfolio Standard program specifically excludes local publicly owned electric utilities like the TDPUD from the definition of "retail seller" (CEC 2008). Instead, local publicly owned electric utilities, such as the TDPUD, are required to implement a

Renewables Portfolio Standard but are given flexibility in developing utility-specific targets, timelines, and resource eligibility rules (CEC 2008).

For the reasons above, the District-preferred SOI boundary scenario would not conflict with AB 32 goals for reducing GHG emissions. Both Liberty Utilities CalPeco and the TDPUD are expected to achieve the mandated requirements of the Renewables Portfolio Standard program regardless of their respective Spheres of Influence due to CPUC and CEC oversight.

As previously stated, all future development associated with the maximum development potential of both the LAFCo-recommended SOI and the District-preferred SOI would be subject to applicable California state regulatory requirements, which would also reduce the GHG emissions. As shown in **Table 3.2-9,** future development would comply with the strategies to help California reach the emissions reduction targets under the AB 32 Scoping Plan. Furthermore, the District-preferred SOI boundary scenario would not conflict with AB 32 goals for reducing GHG emissions, since both Liberty Utilities CalPeco and the TDPUD are expected to achieve the mandated requirements of the Renewables Portfolio Standard program regardless of their respective SOIs due to CPUC and CEC oversight. This impact is therefore **less than cumulatively considerable**.

Mitigation Measures

None required.

REFERENCES

BAAQMD (Bay Area Air Quality Management District). 2011. *California Environmental Quality Act Guidelines.*

California Climate Action Registry. 2009. *California Climate Action Registry General Reporting Protocol Version 3.1.*

CARB (California Air Resources Board). 2008a. *Climate Change Scoping Plan Appendices* (Appendix F).

———. 2010a. *California Greenhouse Gas Inventory for 2000–2008.* http://www.arb.ca.gov/cc/inventory/data/data.htm.

———. 2010b. *Proposed Regulation to Implement the California Cap-and-Trade Program.*

CEC (California Energy Commission). 2008. *The Progress of California's Publicly Owned Utilities in Implementing Renewables Portfolio Standards.*

———. 2011. Updated Publicly Owned Utilities Database as of October 2011. http://www.energy.ca.gov/2008publications/CEC-300-2008-005/index.html.

CNRA (California Natural Resources Agency). 2009a. *2009 California Climate Adaptation Strategy*.

———. 2009b. *Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97*. http://ceres.ca.gov/ceqa/docs /Final_Statement_of_Reasons.pdf.

———. 2009c. *Adopted Text of the CEQA Guidelines Amendments*. Adopted December 30, 2009; effective March 18, 2010.

CPUC (California Public Utilities Commission). 2011. *Order Instituting Rulemaking Regarding Implementation and Administration of the Renewables Portfolio Standard Program.*

CPUC (California Public Utilities Commission), Division of Ratepayer Advocates. 2012. *Report on the Results of Operations for California Pacific Electric Company General Rate Case Test Year 2013 – Customer Accounts, Customer Service & Information Expenses.*

DOF (California Department of Finance). 2012. *Population and Housing Estimates for Cities, Counties, and the State, January 2011 and 2012, with 2010 Benchmark*.

EFCTC (European Fluorocarbons Technical Committee). 2003. *Fluorocarbons and Sulphur Hexafluoride: Perfluorocarbons (PFCs) Fact Sheet*.

EIA (Energy Information Administration). 1995. *How Many Employees Are There? – Commercial Buildings.*

EPA (US Environmental Protection Agency). 2008. *SF6 Emission Reduction Partnership for Electric Power Systems: Basic Information*. http://www.epa.gov/electricpower-sf6/basic.html.

———. 2009. *Endangerment and Cause or Contribute Finding for Greenhouse Gases under the Clean Air Act.* Last revised December 18, 2009.

———. 2010a. *Nitrous Oxide*. http://www.epa.gov/nitrousoxide/scientific.html.

———. 2010b. *High Global Warming Potential Gases*. http://epa.gov/highgwp/.

———. 2010c. *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2008.*

———. 2010d. *PSD and Title V Permitting Guidance for Greenhouse Gases*.

———. 2011a. *Climate Change – Greenhouse Gas Emissions: Carbon Dioxide.* http://www.epa.gov/climatechange/emissions/co2.html.

———. 2011b. *Methane*. http://www.epa.gov/methane/scientific.html.

Longmire, Sam. 2013. Northern Sierra Air Management District. E-mail communications with PMC staff.

Nevada County. 1994. *Nevada County General Plan* (amended through 2010).

———. 1995. *Nevada County General Plan Draft Environmental Impact Report.*

———. 1997. *Nevada County Zoning District Map 135.* http://www.mynevadacounty.com/nc/igs/gis/docs/GIS%20Maps%20(Public)/Zoning%20Maps%20(Public)/Zoning%20District%20Map%20ZDM%20Pages%20in%20B%20and%20W/ZDM%20135.pdf.

Neus, Kathleen. 2013. Special Projects Administrator, Truckee Donner Public Utility District. Telephone and e-mail communication with PMC. April 16 and 17.

NHSTA (National Highway Safety Traffic Administration). 2009. *Average Fuel Economy Standards Passenger Cars and Light Trucks Model Year 2011, Final Rule*.

Placer County. 1994. *Placer County General Plan.*

———. 2003a. *Martis Valley Community Plan*.

———. 2003b. *Martis Valley Community Plan Final Environmental Impact Report*.

Sierra County. 1996. *Sierra County General Plan*.

Smart, Michael. 2012. President, Liberty Utilities CalPeco West. E-mail communication with PMC. August 16.

———. 2013. President, Liberty Utilities CalPeco West. E-mail communication with PMC. April 16.

Truckee, Town of. 2005. *Town of Truckee 2025 General Plan.*

———. 2006. *Town of Truckee 2025 General Plan Draft Environmental Impact Report*.

Nevada LAFCo Recommended TDPUD Sphere of Influence

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
General Light Industry	209	1000sqft
Single Family Housing	839	Dwelling Unit
Strip Mall	97	1000sqft

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	
Climate Zone	14		2.2
		Precipitation Freq (Days)	
			72

1.3 User Entered Comments

Project Characteristics - CO2 Intensity Factor per TDPUD

2.0 Emissions Summary

2.1 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area											866.65	1,100.67	1,967.33	0.82	0.08	2,009.91
Energy											0.00	3,754.09	3,754.09	0.13	0.06	3,776.65
Mobile											0.00	20,957.19	20,957.19	1.31	0.00	20,984.75
Waste											2,610.71	0.00	2,610.71	154.29	0.00	5,850.76
Water											0.00	1,854.19	1,854.19	33.34	0.85	2,819.23
Total											**3,477.36**	**27,666.14**	**31,143.51**	**189.89**	**0.99**	**35,441.30**

3.0 Mobile Detail

3.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Unmitigated											0.00	20,957.19	20,957.19	1.31	0.00	20,984.75
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

3.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Light Industry	1,456.73	275.88	142.12	4,250,723	4,250,723
Single Family Housing	8,029.23	8,457.12	7358.03	28,557,203	28,557,203
Strip Mall	4,299.04	4,077.88	1981.71	6,282,370	6,282,370
Total	13,785.00	12,810.88	9,481.86	39,090,296	39,090,296

3.3 Trip Type Information

	Miles			Trip %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW
General Light Industry	14.70	6.60	6.60	59.00	28.00	13.00
Single Family Housing	16.80	7.10	7.90	37.30	20.70	42.00
Strip Mall	14.70	6.60	6.60	16.60	64.40	19.00

4.0 Energy Detail

4.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Unmitigated											0.00	2,475.18	2,475.18	0.11	0.04	2,489.96
NaturalGas Unmitigated											0.00	1,278.91	1,278.91	0.02	0.02	1,286.69
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

4.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU	tons/yr										MT/yr					
General Light Industry	769120											0.00	41.04	41.04	0.00	0.00	41.29
Single Family Housing	2.24605e+007											0.00	1,198.58	1,198.58	0.02	0.02	1,205.87
Strip Mall	736230											0.00	39.29	39.29	0.00	0.00	39.53
Total												**0.00**	**1,278.91**	**1,278.91**	**0.02**	**0.02**	**1,286.69**

4.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
General Light Industry	988570					301.91	0.01	0.00	303.72
Single Family Housing	5.62808e+006					1,718.84	0.07	0.03	1,729.10
Strip Mall	1.48798e+006					454.43	0.02	0.01	457.15
Total						**2,475.18**	**0.10**	**0.04**	**2,489.97**

5.0 Area Detail

5.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Unmitigated											866.65	1,100.67	1,967.33	0.82	0.08	2,009.91
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

5.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating											0.00	0.00	0.00	0.00	0.00	0.00
Consumer Products											0.00	0.00	0.00	0.00	0.00	0.00
Hearth											866.65	1,090.38	1,957.03	0.81	0.08	1,999.39
Landscaping											0.00	10.29	10.29	0.01	0.00	10.53
Total											**866.65**	**1,100.67**	**1,967.32**	**0.82**	**0.08**	**2,009.92**

6.0 Water Detail

6.1 Mitigation Measures Water

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr				MT/yr			
Unmitigated					1,854.19	33.34	0.85	2,819.23
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

6.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	tons/yr				MT/yr			
General Light Industry	1027.64 / 0					1,709.74	31.44	0.81	2,619.77
Single Family Housing	54.6642 / 34.4622					127.79	1.67	0.04	176.41
Strip Mall	7.18503 / 4.40373					16.66	0.22	0.01	23.05
Total						**1,854.19**	**33.33**	**0.86**	**2,819.23**

7.0 Waste Detail

7.1 Mitigation Measures Waste

Category/Year

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
	tons/yr				MT/yr			
Unmitigated					2,610.71	154.29	0.00	5,850.76
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

7.2 Waste by Land Use

Unmitigated

	Waste Disposed	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	tons	tons/yr				MT/yr			
General Light Industry	12159.4					2,468.24	145.87	0.00	5,531.48
Single Family Housing	600					121.79	7.20	0.00	272.95
Strip Mall	101.85					20.67	1.22	0.00	46.33
Total						**2,610.70**	**154.29**	**0.00**	**5,850.76**

District Preferred TDPUD Sphere of Influence - Electric Service Residential

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
Single Family Housing	13908	Dwelling Unit

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	
Climate Zone	14		2.2
		Precipitation Freq (Days)	
			72

1.3 User Entered Comments

Project Characteristics - CO2 Intensity Factor per TDPUD

2.0 Emissions Summary

2.1 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area											14,366.38	18,245.75	32,612.12	13.68	1.35	33,318.10
Energy											0.00	48,361.62	48,361.62	1.61	0.83	48,652.61
Mobile											0.00	252,180.99	252,180.99	15.42	0.00	252,504.80
Waste											2,018.59	0.00	2,018.59	119.30	0.00	4,523.80
Water											0.00	2,118.28	2,118.28	27.75	0.72	2,924.37
Total											**16,384.97**	**320,906.64**	**337,291.60**	**177.76**	**2.90**	**341,923.68**

3.0 Mobile Detail

3.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Unmitigated											0.00	252,180.99	252,180.99	15.42	0.00	252,504.80
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

3.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Single Family Housing	133,099.56	140,192.64	121973.16	473,389,254	473,389,254
Total	133,099.56	140,192.64	121,973.16	473,389,254	473,389,254

3.3 Trip Type Information

	Miles			Trip %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW
Single Family Housing	16.80	7.10	7.90	37.30	20.70	42.00

4.0 Energy Detail

4.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Unmitigated											0.00	28,492.94	28,492.94	1.23	0.47	28,663.02
NaturalGas Unmitigated											0.00	19,868.68	19,868.68	0.38	0.36	19,989.59
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

4.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU	tons/yr										MT/yr					
Single Family Housing	3.72325e+008											0.00	19,868.68	19,868.68	0.38	0.36	19,989.59
Total												**0.00**	**19,868.68**	**19,868.68**	**0.38**	**0.36**	**19,989.59**

4.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
Single Family Housing	9.3296e+007					28,492.94	1.23	0.47	28,663.02
Total						**28,492.94**	**1.23**	**0.47**	**28,663.02**

5.0 Area Detail

5.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Unmitigated											14,366.38	18,245.75	32,612.12	13.68	1.35	33,318.10
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

5.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating											0.00	0.00	0.00	0.00	0.00	0.00
Consumer Products											0.00	0.00	0.00	0.00	0.00	0.00
Hearth											14,366.38	18,075.15	32,441.52	13.49	1.35	33,143.58
Landscaping											0.00	170.60	170.60	0.19	0.00	174.53
Total											**14,366.38**	**18,245.75**	**32,612.12**	**13.68**	**1.35**	**33,318.11**

6.0 Water Detail

6.1 Mitigation Measures Water

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr				MT/yr			
Unmitigated					2,118.28	27.75	0.72	2,924.37
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

6.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	tons/yr				MT/yr			
Single Family Housing	906.162 / 571.276					2,118.28	27.75	0.72	2,924.37
Total						**2,118.28**	**27.75**	**0.72**	**2,924.37**

7.0 Waste Detail

7.1 Mitigation Measures Waste

Category/Year

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
	tons/yr				MT/yr			
Unmitigated					2,018.59	119.30	0.00	4,523.80
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

7.2 Waste by Land Use

Unmitigated

	Waste Disposed	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	tons	tons/yr				MT/yr			
Single Family Housing	9944.25					2,018.59	119.30	0.00	4,523.80
Total						**2,018.59**	**119.30**	**0.00**	**4,523.80**

District Preferred TDPUD Sphere of Influence - Electric Service Nonresidential

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
General Office Building	44.6	1000sqft
General Light Industry	209	1000sqft
Strip Mall	530.5	1000sqft

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	
Climate Zone	14		2.2
		Precipitation Freq (Days)	
			72

1.3 User Entered Comments

Project Characteristics - CO2 Intensity Factor per TDPUD

2.0 Emissions Summary

2.1 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area											0.00	0.00	0.00	0.00	0.00	0.00
Energy											0.00	3,260.31	3,260.31	0.13	0.05	3,279.81
Mobile											0.00	21,874.75	21,874.75	1.52	0.00	21,906.59
Waste											2,589.73	0.00	2,589.73	153.05	0.00	5,803.75
Water											0.00	1,819.25	1,819.25	32.89	0.84	2,771.27
Total											**2,589.73**	**26,954.31**	**29,544.04**	**187.59**	**0.89**	**33,761.42**

3.0 Mobile Detail

3.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Unmitigated											0.00	21,874.75	21,874.75	1.52	0.00	21,906.59
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

3.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Light Industry	1,456.73	275.88	142.12	4,250,723	4,250,723
General Office Building	491.05	105.70	43.71	1,027,278	1,027,278
Strip Mall	23,511.76	22,302.22	10838.12	34,358,734	34,358,734
Total	25,459.54	22,683.80	11,023.94	39,636,735	39,636,735

3.3 Trip Type Information

	Miles			Trip %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW
General Light Industry	14.70	6.60	6.60	59.00	28.00	13.00
General Office Building	14.70	6.60	6.60	33.00	48.00	19.00
Strip Mall	14.70	6.60	6.60	16.60	64.40	19.00

4.0 Energy Detail

4.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Unmitigated											0.00	2,955.47	2,955.47	0.13	0.05	2,973.11
NaturalGas Unmitigated											0.00	304.85	304.85	0.01	0.01	306.70
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

4.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU	tons/yr										MT/yr					
General Light Industry	769120											0.00	41.04	41.04	0.00	0.00	41.29
General Office Building	916976											0.00	48.93	48.93	0.00	0.00	49.23
Strip Mall	4.0265e+006											0.00	214.87	214.87	0.00	0.00	216.18
Total												**0.00**	**304.84**	**304.84**	**0.00**	**0.00**	**306.70**

4.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
General Light Industry	988570					301.91	0.01	0.00	303.72
General Office Building	550810					168.22	0.01	0.00	169.22
Strip Mall	8.13787e+006					2,485.34	0.11	0.04	2,500.17
Total						**2,955.47**	**0.13**	**0.04**	**2,973.11**

5.0 Area Detail

5.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Unmitigated											0.00	0.00	0.00	0.00	0.00	0.00
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

5.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating											0.00	0.00	0.00	0.00	0.00	0.00
Consumer Products											0.00	0.00	0.00	0.00	0.00	0.00
Landscaping											0.00	0.00	0.00	0.00	0.00	0.00
Total											**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

6.0 Water Detail

6.1 Mitigation Measures Water

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr				MT/yr			
Unmitigated					1,819.25	32.89	0.84	2,771.27
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

6.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	tons/yr				MT/yr			
General Light Industry	1027.64 / 0					1,709.74	31.44	0.81	2,619.77
General Office Building	7.92693 / 4.85844					18.38	0.24	0.01	25.43
Strip Mall	39.2955 / 24.0843					91.12	1.20	0.03	126.07
Total						**1,819.24**	**32.88**	**0.85**	**2,771.27**

7.0 Waste Detail

7.1 Mitigation Measures Waste

Category/Year

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
	tons/yr				MT/yr			
Unmitigated					2,589.73	153.05	0.00	5,803.75
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

7.2 Waste by Land Use

Unmitigated

	Waste Disposed	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	tons	tons/yr				MT/yr			
General Light Industry	12159.4					2,468.24	145.87	0.00	5,531.48
General Office Building	41.48					8.42	0.50	0.00	18.87
Strip Mall	557.02					113.07	6.68	0.00	253.40
Total						**2,589.73**	**153.05**	**0.00**	**5,803.75**

District Preferred TDPUD Sphere of Influence - Water Service Additional Residential

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
Single Family Housing	59	Dwelling Unit

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	
Climate Zone	14		2.2
		Precipitation Freq (Days)	
			72

1.3 User Entered Comments

Project Characteristics - CO2 Intensity Factor per TDPUD

2.0 Emissions Summary

2.1 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area											60.94	77.40	138.35	0.06	0.01	141.34
Energy											0.00	205.16	205.16	0.01	0.00	206.39
Mobile											0.00	1,069.79	1,069.79	0.07	0.00	1,071.17
Waste											8.58	0.00	8.58	0.51	0.00	19.22
Water											0.00	8.99	8.99	0.12	0.00	12.41
Total											**69.52**	**1,361.34**	**1,430.87**	**0.77**	**0.01**	**1,450.53**

3.0 Mobile Detail

3.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Unmitigated											0.00	1,069.79	1,069.79	0.07	0.00	1,071.17
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

3.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Single Family Housing	564.63	594.72	517.43	2,008,194	2,008,194
Total	564.63	594.72	517.43	2,008,194	2,008,194

3.3 Trip Type Information

	Miles			Trip %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW
Single Family Housing	16.80	7.10	7.90	37.30	20.70	42.00

4.0 Energy Detail

4.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Unmitigated											0.00	120.87	120.87	0.01	0.00	121.59
NaturalGas Unmitigated											0.00	84.29	84.29	0.00	0.00	84.80
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

4.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU	tons/yr										MT/yr					
Single Family Housing	1.57946e+006											0.00	84.29	84.29	0.00	0.00	84.80
Total												**0.00**	**84.29**	**84.29**	**0.00**	**0.00**	**84.80**

4.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
Single Family Housing	395777					120.87	0.01	0.00	121.59
Total						**120.87**	**0.01**	**0.00**	**121.59**

5.0 Area Detail

5.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Unmitigated											60.94	77.40	138.35	0.06	0.01	141.34
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

5.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating											0.00	0.00	0.00	0.00	0.00	0.00
Consumer Products											0.00	0.00	0.00	0.00	0.00	0.00
Hearth											60.94	76.68	137.62	0.06	0.01	140.60
Landscaping											0.00	0.72	0.72	0.00	0.00	0.74
Total											**60.94**	**77.40**	**138.34**	**0.06**	**0.01**	**141.34**

6.0 Water Detail

6.1 Mitigation Measures Water

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr				MT/yr			
Unmitigated					8.99	0.12	0.00	12.41
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

6.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	tons/yr				MT/yr			
Single Family Housing	3.84409 / 2.42345					8.99	0.12	0.00	12.41
Total						**8.99**	**0.12**	**0.00**	**12.41**

7.0 Waste Detail

7.1 Mitigation Measures Waste

Category/Year

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
	tons/yr				MT/yr			
Unmitigated					8.58	0.51	0.00	19.22
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

7.2 Waste by Land Use

Unmitigated

	Waste Disposed	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	tons	tons/yr				MT/yr			
Single Family Housing	42.25					8.58	0.51	0.00	19.22
Total						**8.58**	**0.51**	**0.00**	**19.22**

District Preferred TDPUD Sphere of Influence - Electric Service Residential

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
Single Family Housing	13908	Dwelling Unit

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	
Climate Zone	14		2.2
		Precipitation Freq (Days)	
			72

1.3 User Entered Comments

Project Characteristics - CO2 Intensity Factor per Liberty Utilities CalPeco

2.0 Emissions Summary

2.1 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
Single Family Housing	9.3296e+007					55,614.77	1.23	0.47	55,784.84
Total						**55,614.77**	**1.23**	**0.47**	**55,784.84**

District Preferred TDPUD Sphere of Influence - Electric Service Nonresidential

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
General Office Building	44.6	1000sqft
General Light Industry	209	1000sqft
Strip Mall	530.5	1000sqft

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	
Climate Zone	14		2.2
		Precipitation Freq (Days)	
			72

1.3 User Entered Comments

Project Characteristics - CO2 Intensity Factor per Liberty Utilities CalPeco

2.0 Emissions Summary

2.1 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
General Light Industry	988570					589.30	0.01	0.00	591.10
General Office Building	550810					328.34	0.01	0.00	329.35
Strip Mall	8.13787e+006					4,851.07	0.11	0.04	4,865.91
Total						**5,768.71**	**0.13**	**0.04**	**5,786.36**

District Preferred TDPUD Sphere of Influence - Water Service Additional Residential

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
Single Family Housing	59	Dwelling Unit

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	
Climate Zone	14		2.2
		Precipitation Freq (Days)	
			72

1.3 User Entered Comments

Project Characteristics - CO2 Intensity Factor per Liberty Utilities CalPeco

2.0 Emissions Summary

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
Single Family Housing	395777					235.93	0.01	0.00	236.65
Total						**235.93**	**0.01**	**0.00**	**236.65**

APPENDIX B-ORIGINAL 3.2
CLIMATE CHANGE AND GREENHOUSE GASES

This section of the Draft EIR provides a discussion of the proposed project's effect on greenhouse gas emissions and the associated effects of climate change. The California Environmental Quality Act (CEQA) requires that lead agencies consider the reasonably foreseeable adverse environmental effects of projects they are considering for approval.

3.2.1 EXISTING SETTING

EXISTING CLIMATE SETTING

Since the early 1990s, scientific consensus holds that the world's population is releasing greenhouse gases faster than the earth's natural systems can absorb them. These gases are released as byproducts of fossil fuel combustion, waste disposal, energy use, land-use changes, and other human activities. This release of gases, such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O), creates a blanket around the earth that allows light to pass through but traps heat at the surface preventing its escape into space. While this is a naturally occurring process known as the greenhouse effect, human activities have accelerated the generation of greenhouse gases beyond natural levels. The overabundance of greenhouse gases in the atmosphere has led to an unexpected warming of the earth and has the potential to severely impact the earth's climate system.

While often used interchangeably, there is a difference between the terms "climate change" and "global warming." According to the National Academy of Sciences, climate change refers to any significant, measurable change of climate lasting for an extended period of time that can be caused by both natural factors and human activities. Global warming, on the other hand, is an average increase in the temperature of the atmosphere caused by increased greenhouse gas emissions. The use of the term climate change is becoming more prevalent because it encompasses all changes to the climate, not just temperature.

To fully understand global climate change, it is important to recognize the naturally occurring greenhouse effect and to define the greenhouse gases that contribute to this phenomenon. Various gases in the earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space and a portion of the radiation is absorbed by the earth's surface. The earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. Greenhouse gases, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are CO_2, CH_4, N_2O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).

Table 3.2-1 provides descriptions of the primary greenhouse gases attributed to global climate change, including a description of their physical properties, primary sources, and contribution to the greenhouse effect.

TABLE 3.2-1
GREENHOUSE GASES

Greenhouse Gas	Description
Carbon dioxide (CO_2)	Carbon dioxide is a colorless, odorless gas. CO_2 is emitted in a number of ways, both naturally and through human activities. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, industrial facilities, and other sources. The atmospheric lifetime of CO_2 is variable because it is so readily exchanged in the atmosphere.[1]
Methane (CH_4)	Methane is a colorless, odorless gas that is not flammable under most circumstances. CH_4 is the major component of natural gas, about 87 percent by volume. It is also formed and released to the atmosphere by biological processes occurring in anaerobic environments. Methane is emitted from a variety of both human-related and natural sources. Human-related sources include fossil fuel production, animal husbandry (intestinal fermentation in livestock and manure management), rice cultivation, biomass burning, and waste management. These activities release significant quantities of methane to the atmosphere. Natural sources of methane include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and other sources such as wildfires. Methane's atmospheric lifetime is about 12 years.[2]
Nitrous oxide (N_2O)	Nitrous oxide is a clear, colorless gas with a slightly sweet odor. N_2O is produced by both natural and human-related sources. Primary human-related sources of N_2O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, adipic acid production, and nitric acid production. N_2O is also produced naturally from a wide variety of biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N_2O is approximately 120 years.[3]
Hydrofluorocarbons (HFCs)	Hydrofluorocarbons are man-made chemicals, many of which have been developed as alternatives to ozone-depleting substances for industrial, commercial, and consumer products. The atmospheric lifetime for HFCs varies from just over a year for HFC-152a to 260 years for HFC-23. Most of the commercially used HFCs have atmospheric lifetimes less than 15 years (e.g., HFC-134a, which is used in automobile air conditioning and refrigeration, has an atmospheric life of 14 years).[4]
Perfluorocarbons (PFCs)	Perfluorocarbons are colorless, highly dense, chemically inert, and nontoxic. There are seven PFC gases: perfluoromethane (CF_4), perfluoroethane (C_2F_6), perfluoropropane (C_3F_8), perfluorobutane (C_4F_{10}), perfluorocyclobutane (C_4F_8), perfluoropentane (C_5F_{12}), and perfluorohexane (C_6F1_4). Natural geological emissions have been responsible for the PFCs that have accumulated in the atmosphere in the past; however, the largest current source is aluminum production, which releases CF_4 and C_2F_6 as byproducts. The estimated atmospheric lifetimes for CF_4 and C_2F_6 are 50,000 and 10,000 years, respectively.[4,5]
Sulfur hexafluoride (SF_6)	Sulfur hexafluoride is an inorganic compound that is colorless, odorless, nontoxic, and generally nonflammable. SF_6 is primarily used as an electrical insulator in high voltage equipment. The electric power industry uses roughly 80 percent of all SF_6 produced worldwide. Significant leaks occur from aging equipment and during equipment maintenance and servicing. SF_6 has an atmospheric life of 3,200 years.[4]

Sources: [1]EPA 2011a, [2]EPA 2011b, [3]EPA 2010a, [4]EPA 2010b, [5]EFCTC 2003

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. Gases with high global warming potential, such as HFCs, PFCs, and SF_6, are the most heat-absorbent. Methane traps over 21 times more heat per molecule than CO_2, and N_2O absorbs 310 times more heat per molecule than CO_2. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO_2e), which weight each gas by its global warming potential (GWP). Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted. **Table 3.2-2** shows the GWPs for different greenhouse gases for a 100-year time horizon.

TABLE 3.2-2
GLOBAL WARMING POTENTIAL FOR GREENHOUSE GASES

Greenhouse Gas	Global Warming Potential
Carbon dioxide (CO_2)	1
Methane (CH_4)	21
Nitrous oxide (N_2O)	310
Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs)	6,500
Sulfur hexafluoride (SF_6)	23,900

Source: California Climate Action Registry 2009

As the name implies, global climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern, respectively. California is a significant emitter of CO_2 in the world and produced 477 million gross metric tons of carbon dioxide equivalent in 2008 (CARB 2010). Consumption of fossil fuels in the transportation sector was the single largest source of California's GHG emissions in 2008, accounting for 36.4 percent of total GHG emissions in the state (CARB 2010). This category was followed by the electric power sector (including both in-state and out-of-state sources) (24.3 percent) and the industrial sector (19.3 percent) (CARB 2010).

EFFECTS OF GLOBAL CLIMATE CHANGE

California can draw on substantial scientific research conducted by experts at various state universities and research institutions. With more than a decade of concerted research, scientists have established that the early signs of climate change are already evident in the state—as shown, for example, in increased average temperatures, changes in temperature extremes, reduced snowpack in the Sierra Nevada, sea level rise, and ecological shifts.

Many of these changes are accelerating—locally, across the country, and around the globe. As a result of emissions already released into the atmosphere, California is anticipated to face intensifying climate changes in coming decades (CNRA 2009). Generally, research indicates that California should expect overall hotter and drier conditions with a continued reduction in winter snow (with concurrent increases in winter rains), as well as increased average temperatures, and accelerating sea-level rise. In addition to changes in average temperatures, sea level, and precipitation patterns, the intensity of extreme weather events is also changing (CNRA 2009).

Climate change temperature projections identified in the 2009 California Climate Adaptation Strategy suggest the following (CNRA 2009):

- Average temperature increase is expected to be more pronounced in the summer than in the winter season.
- Inland areas are likely to experience more pronounced warming than coastal regions.
- Heat waves are expected to increase in frequency, with individual heat waves also showing a tendency toward becoming longer, and extending over a larger area, thus more likely to encompass multiple population centers in California at the same time.
- As GHGs remain in the atmosphere for decades, temperature changes over the next 30 to 40 years are already largely determined by past emissions. By 2050, temperatures are projected to increase by an additional 1.8 to 5.4°F (an increase one to three times as large as that which occurred over the entire 20th century).
- By 2100, the models project temperature increases between 3.6 and 9°F.

Precipitation levels are expected to change over the 21st century, though models differ in determining where and how much rain and snowfall patterns may change (CNRA 2009). Eleven out of 12 precipitation models run by the Scripps Institution of Oceanography suggest a small to significant (12–35 percent) overall decrease in precipitation levels by mid-century (CNRA 2009). In addition, higher temperatures increase evaporation and make for a generally drier climate, as higher temperatures hasten snowmelt. Moreover, the 2009 California Climate Adaptation Strategy concludes that more precipitation may fall as rain rather than as snow, with important implications for water management in the state. California communities have largely depended on runoff from yearly established snowpack to provide the water supplies during the warmer, drier months of late spring, summer, and early autumn. With rainfall and meltwater running off earlier in the year, the state may face increasing challenges of storing the water for the dry season while protecting Californians downstream from floodwaters during the wet season.

According to the 2009 California Climate Adaptation Strategy, the impacts of climate change in California have the potential to include, but are not limited to, the areas discussed in **Table 3.2-3**.

TABLE 3.2-3
POTENTIAL STATEWIDE IMPACTS FROM CLIMATE CHANGE

Potential Statewide Impact	Description
Public Health	Climate change is expected to lead to an increase in ambient (i.e., outdoor) average air temperature, with greater increases expected in summer than in winter months. Larger temperature increases are anticipated in inland communities as compared to the California coast. The potential health impacts from sustained and significantly higher than average temperatures include heat stroke, heat exhaustion, and the exacerbation of existing medical conditions such as cardiovascular and respiratory diseases, diabetes, nervous system disorders, emphysema, and epilepsy. Numerous studies have indicated that there are generally more deaths during periods of sustained higher temperatures, and these are due to cardiovascular causes and other chronic diseases. The elderly, infants, and socially isolated people with pre-existing illnesses who lack access to air conditioning or cooling spaces are among the most at risk during heat waves.

Potential Statewide Impact	Description
Floods and Droughts	The impacts of flooding can be significant. Results may include population displacement, severe psychosocial stress with resulting mental health impacts, exacerbation of pre-existing chronic conditions, and infectious disease. Additionally, impacts can range from a loss of personal belongings, and the emotional ramifications from such loss, to direct injury and/or mortality. Drinking water contamination outbreaks in the United States are associated with extreme precipitation events. Runoff from rainfall is also associated with coastal contamination that can lead to contamination of shellfish and contribute to food-borne illness. Floodwaters may contain household, industrial, and agricultural chemicals as well as sewage and animal waste. Flooding and heavy rainfall events can wash pathogens and chemicals from contaminated soils, farms, and streets into drinking water supplies. Flooding may also overload storm and wastewater systems, or flood septic systems, also leading to possible contamination of drinking water systems. Drought impacts develop more slowly over time. Risks to public health that Californians may face from drought include impacts on water supply and quality, food production (both agricultural and commercial fisheries), and risks of waterborne illness. As surface water supplies are reduced as a result of drought conditions, the amount of groundwater pumping is expected to increase to make up for the water shortfall. The increase in groundwater pumping has the potential to lower the water tables and cause land subsidence. Communities that utilize well water will be adversely affected by drops in water tables or through changes in water quality. Groundwater supplies have higher levels of total dissolved solids compared to surface waters. This introduces a set of effects for consumers, such as repair and maintenance costs associated with mineral deposits in water heaters and other plumbing fixtures, and on public water system infrastructure designed for lower salinity surface water supplies. Drought may also lead to increased concentration of contaminants in drinking water supplies.
Water Resources	The state's water supply system already faces challenges to provide water for California's growing population. Climate change is expected to exacerbate these challenges through increased temperatures and possible changes in precipitation patterns. The trends of the last century—especially increases in hydrologic variability—will likely intensify in this century. The state can expect to experience more frequent and larger floods and deeper droughts. Rising sea level will threaten the Delta water conveyance system and increase salinity in near-coastal groundwater supplies. Planning for and adapting to these simultaneous changes, particularly their impacts on public safety and long-term water supply reliability, will be among the most significant challenges facing water and flood managers this century.
Forests and Landscapes	Global climate change has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, wildfire occurrence statewide could increase from 57 percent to 169 percent by 2085. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks will not be uniform throughout the state.

Source: CNRA 2009

3.2.2 REGULATORY FRAMEWORK

FEDERAL REGULATION AND THE CLEAN AIR ACT

In the past, the US Environmental Protection Agency (EPA) has not regulated greenhouse gases under the Clean Air Act (CAA) because it asserted that the act did not authorize the EPA to issue mandatory regulations to address global climate change and that such regulation would be unwise without an unequivocally established causal link between GHGs and the increase in

global surface air temperatures. However, the US Supreme Court held that the EPA must consider regulation of motor vehicle GHG emissions. In *Massachusetts v. Environmental Protection Agency et al.*, twelve states and cities, including California, together with several environmental organizations, sued to require the EPA to regulate GHGs as pollutants under the Clean Air Act (127 S. Ct. 1438 [2007]). The Court ruled that GHGs fit within the Clean Air Act's definition of a pollutant and that the EPA did not have a valid rationale for not regulating GHGs. In response to this ruling, the EPA made an endangerment finding that greenhouse gases pose a threat to the public health and welfare. This is the first step necessary for the establishment of federal GHG regulations under the Clean Air Act.

In April 2010, the EPA issued the final rule on new standards for GHG emissions and fuel economy for light-duty vehicles in model years 2017–2025. In November 2010, the EPA published the *PSD [Prevention of Significant Deterioration] and Title V Permitting Guidance for Greenhouse Gases*, which provides the basic information that permit writers and applicants need to address GHG emissions regulated under the Clean Air Act. In that document, the EPA described the Tailoring Rule in the regulation of GHG emissions. With the Tailoring Rule, the EPA established a phased schedule in the regulation of stationary sources. The first phase of the Tailoring Rule began January 2, 2011, and focuses the GHG permitting programs on the largest sources with the most Clean Air Act permitting experience. In step two, which began June 1, 2011, the rule expands to cover large sources of GHGs that may not have been previously covered by the Clean Air Act for other pollutants. The rule also describes the EPA's commitment to future rulemaking that will describe subsequent steps of the Tailoring Rule for GHG permitting (EPA 2010d).

FEDERAL HEAVY-DUTY NATIONAL PROGRAM

In August 2011, the EPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) announced the first-ever program to reduce greenhouse gas emissions and improve fuel efficiency of heavy-duty trucks and buses. The EPA and the NHTSA have each adopted complementary standards under their respective authorities covering model years 2014–2018, which together form a comprehensive Heavy-Duty National Program. The goal of the joint rulemakings is to present coordinated federal standards that help manufacturers to build a single fleet of vehicles and engines that are able to comply with both. The EPA and the NHTSA have adopted standards for CO_2 emissions and fuel consumption, respectively, tailored to each of three main regulatory categories: (1) combination tractors; (2) heavy-duty pickup trucks and vans; and (3) vocational vehicles. The EPA has additionally adopted standards to control HFC leakage from air conditioning systems in pickups and vans and combination tractors. Also exclusive to the EPA program are the EPA's N_2O and CH_4 standards that will apply to all heavy-duty engines, pickups, and vans. For purposes of this program, the heavy-duty fleet incorporates all on-road vehicles rated at a gross vehicle weight at or above 8,500 pounds, and the engines that power them, except those covered by the current GHG emissions and Corporate Average Fuel Economy standards for model year 2012–2016 passenger vehicles.

The Heavy-Duty National Program is projected to reduce fuel use and GHG emissions from medium- and heavy-duty vehicles, from semi trucks to the largest pickup trucks and vans, as well as all types and sizes of work trucks and buses in between. Vehicles covered by this program make up the transportation segment's second largest contributor to oil consumption and GHG emissions. This comprehensive program is designed to address the urgent and closely intertwined challenges of dependence on oil, energy security, and global climate change. The EPA and the NHTSA estimate that the combined standards will reduce CO_2 emissions by about 270 million metric tons and save about 530 million barrels of oil over the life of vehicles built for the 2014 to 2018 model years, providing $49 billion in net program benefits. A second phase of regulations is planned for model years beyond 2018. The goals would include spurring innovation as well as

updating the assessment of actual emissions and fuel use from this sector. Such future regulation would also be designed to align with similar programs developed outside the United States.

STATE

Executive Order S-3-05

Executive Order S-3-05 (State of California) proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra's snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established total greenhouse gas emission targets. Specifically, emissions are to be reduced to the 2000 level by 2010, to the 1990 level by 2020, and to 80 percent below the 1990 level by 2050.

The Executive Order directed the Secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multi-agency effort to reduce greenhouse gas emissions to the target levels. The Secretary will also submit biannual reports to the governor and state legislature describing (1) progress made toward reaching the emission targets, (2) impacts of global warming on California's resources, and (3) mitigation and adaptation plans to combat these impacts. To comply with the Executive Order, the Secretary of CalEPA created a Climate Action Team made up of members from various state agencies and commissions. The Climate Action Team released its first report in March 2006 and continues to release periodic reports on progress. The report proposed to achieve the targets by building on voluntary actions of California businesses, local government and community actions, as well as through state incentive and regulatory programs.

Assembly Bill 32, the California Global Warming Solutions Act of 2006

Assembly Bill (AB) 32 (Health and Safety Code Sections 38500, 38501, 28510, 38530, 38550, 38560, 38561–38565, 38570, 38571, 38574, 38580, 38590, 38592–38599) requires that statewide GHG emissions be reduced to 1990 levels by the year 2020. The gases that are regulated by AB 32 include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, nitrogen trifluoride, and sulfur hexafluoride. The reduction to 1990 levels will be accomplished through an enforceable statewide cap on GHG emissions that will be phased in starting in 2012. To effectively implement the cap, AB 32 directs CARB to develop and implement regulations to reduce statewide GHG emissions from stationary sources. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

AB 32 requires that CARB adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrives at the cap, institute a schedule to meet the emissions cap, and develop tracking, reporting, and enforcement mechanisms to ensure that the state achieves reductions in GHG emissions necessary to meet the cap. CARB is implementing this program. The CARB Board adopted a draft resolution for formal cap-and-trade rulemaking on December 16, 2010, and is developing offset protocols and compliance requirements. AB 32 also includes guidance to institute emissions reductions in an economically efficient manner and conditions to ensure that businesses and consumers are not unfairly affected by the reductions.

Climate Change Scoping Plan

In October of 2008, CARB published its Climate Change Proposed Scoping Plan, which is the State's plan to achieve GHG reductions in California required by AB 32. The Scoping Plan contains the main strategies California will implement to achieve reduction of 169 million metric tons (MMT) of CO_2e, or approximately 30 percent from the state's projected 2020 emission level of 596 MMT of CO_2e under a business-as-usual scenario (this is a reduction of 42 MMT CO_2e, or almost 10 percent, from 2002–2004 average emissions). The Scoping Plan also includes CARB-recommended GHG reductions for each emissions sector of the state's GHG inventory. The largest proposed GHG reduction recommendations are from improving emission standards for light-duty vehicles (estimated reductions of 31.7 MMT CO_2e), implementation of the Low-Carbon Fuel Standard (15.0 MMT CO_2e), energy efficiency measures in buildings and appliances and the widespread development of combined heat and power systems (26.3 MMT CO_2e), and a renewable portfolio standard for electricity production (21.3 MMT CO_2e). The Scoping Plan identifies the local equivalent of AB 32 targets as a 15 percent reduction below baseline greenhouse gas emissions level, with baseline interpreted as greenhouse gas emissions levels between 2003 and 2008. The Scoping Plan states that land use planning and urban growth decisions will play an important role in the state's GHG reductions because local governments have primary authority to plan, zone, approve, and permit how land is developed to accommodate population growth and the changing needs of their jurisdictions. (Meanwhile, CARB is also developing an additional protocol for community emissions.) CARB further acknowledges that decisions on how land is used will have large impacts on the GHG emissions that will result from the transportation, housing, industry, forestry, water, agriculture, electricity, and natural gas emission sectors. The Scoping Plan states that the ultimate GHG reduction assignment to local government operations is to be determined. With regard to land use planning, the Scoping Plan expects approximately 5.0 MMT CO_2e will be achieved associated with implementation of Senate Bill 375, which is discussed further below. The Climate Change Proposed Scoping Plan was approved by CARB on December 11, 2008.

The status of the Scoping Plan had been uncertain as a result of a court decision in the case of *Association of Irritated Residents v. California Air Resources Board* (San Francisco Superior Court Case No. CPF-09-509562). The court found that CARB, in its CEQA review, had not adequately explained why it selected a scoping plan that included a cap-and-trade program rather than an alternative plan. While CARB disagrees with the trial court finding and has appealed the decision, in order to remove any doubt about the matter and in keeping with CARB's interest in public participation and informed decision-making, CARB revisited the alternatives. The revised analysis includes the five alternatives included in the original environmental analysis: a "no project" alternative (that is, taking no action at all); a plan relying on a cap-and-trade program for the sectors included in a cap; a plan relying more on source-specific regulatory requirements with no cap-and-trade component; a plan relying on a carbon fee or tax; and a plan relying on a variety of proposed strategies and measures. The revised analysis relies on emissions projections updated in light of current economic forecasts, accounting for the economic downturn since 2008 and reduction measures already approved and put in place.

The public hearing to consider approval of the AB 32 Scoping Plan Functional Equivalent Document (including the Supplement) and the AB 32 Scoping Plan was held on August 24, 2011. On this date, the Scoping Plan was re-approved by the Board.

Senate Bill 1368

Senate Bill (SB) 1368 (codified at Public Utilities Code Chapter 3) is the companion bill of AB 32. SB 1368 required the California Public Utilities Commission (CPUC) to establish a greenhouse gas emission performance standard for baseload generation from investor-owned utilities by February 1, 2007. The bill also required the California Energy Commission (CEC) to establish a similar standard for local publicly owned utilities by June 30, 2007. These standards cannot exceed the greenhouse gas emission rate from a baseload combined-cycle natural-gas-fired plant. The legislation further requires that all electricity provided to California, including imported electricity, must be generated from plants that meet the standards set by the CPUC and the CEC.

Senate Bill 1078, Governor's Order S-14-08, and Senate Bill 2 (1X) (California Renewables Portfolio Standards)

Senate Bill 1078 (Public Utilities Code Sections 387, 390.1, and 399.25 and Article 16) addresses electricity supply and requires that retail sellers of electricity, including investor-owned utilities electric service providers, and community choice aggregators, provide a minimum 20 percent of their supply from renewable sources by 2017. This Senate Bill will affect statewide GHG emissions associated with electricity generation. In 2008, Governor Schwarzenegger signed Executive Order S-14-08, which set the renewable portfolio standard target to 33 percent by 2020. It directed state government agencies and retail sellers of electricity to take all appropriate actions to implement this target.

Prior to the Executive Order, the CPUC and the CEC were responsible for implementing and overseeing the Renewables Portfolio Standards. The Executive Order shifted that responsibility to the California Air Resources Board (CARB), requiring them to adopt regulations by July 31, 2010. CARB is required by current law, AB 32 of 2006, to regulate sources of greenhouse gases to meet a state goal of reducing greenhouse gas emissions to 1990 levels by 2020 and an 80 percent reduction of 1990 levels by 2050.

In March 2011, Senate Bill 2 (1X) establishing S-14-08 as law passed the state's legislature. While Senate Bill 2 (1X) contains the same targets as Governor's Order S-14-08 (33 percent of supply from renewable sources by 2020), as an executive order it did not have the force of law (Governor's Orders can be reversed by future governors). The Renewables Portfolio Standard program under Senate Bill 2 (1X) specifically excludes local publicly owned electric utilities like the Truckee Donner Public Utility District (TDPUD; District)) from the definition of "retail seller" (CEC 2008). Instead, local publicly owned electric utilities, such as the TDPUD, are required to implement a Renewables Portfolio Standard, but are given flexibility in developing utility-specific targets, timelines, and resource eligibility rules (CEC 2008).

LOCAL

Northern Sierra Air Quality Management District

The project is under jurisdiction of the Northern Sierra Air Quality Management District (NSAQMD), which regulates air quality according to the standards established in the federal and state Clean Air Acts and amendments to those acts. The NSAQMD comprises three contiguous, mountainous, rural counties in northeastern California (Nevada, Sierra, and Plumas counties) and regulates air quality through its permitting authority and through air quality–related planning and review activities over most types of stationary emission sources.

The NSAQMD has not yet established significance thresholds for greenhouse gas emissions from project operations.

3.2.3 IMPACTS AND MITIGATION MEASURES

STANDARDS OF SIGNIFICANCE

Per Appendix G of the State CEQA Guidelines, impacts related to climate change are considered significant if implementation of the proposed project would result in any of the following:

1) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

2) Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

To meet the GHG emission targets of AB 32, California would need to generate less GHG emissions in the future than current levels. It is recognized, however, that for most projects there is no simple metric available to determine if a single project would substantially increase or decrease overall GHG emission levels or conflict with the goals of AB 32. Moreover, emitting GHG emissions into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of GHG emissions in the atmosphere resulting in global climate change and the associated consequences of climate change that results in adverse environmental effects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to generally estimate a project's incremental contribution of GHGs into the atmosphere, it is typically not possible to determine whether or how an individual project's relatively small incremental contribution might translate into physical effects on the environment. Given the complex interactions between various global and regional-scale physical, chemical, atmospheric, terrestrial, and aquatic systems that result in the physical expressions of global climate change, it is impossible to discern whether the presence or absence of GHGs emitted by the project would result in any altered conditions.

However, the State of California has established GHG reduction targets and has determined that GHG emissions as they relate to global climate change are a source of adverse environmental impacts in California that should be addressed under CEQA. Although AB 32 did not amend CEQA, it identifies the myriad environmental problems in California caused by global warming (Health and Safety Code Section 38501[a]). In response to the relative lack of guidance on addressing GHGs and climate change, SB 97 was passed in order to amend CEQA by directing the Office of Planning and Research to prepare revisions to the State CEQA Guidelines addressing the mitigation of GHGs or their consequences. These revisions to the State CEQA Guidelines went into effect in January 2010.

Thresholds of significance illustrate the extent of an impact and are a basis from which to apply mitigation measures. Significance thresholds for GHG emissions resulting from land use development projects have not been established in Nevada County. In June 2010, the Bay Area Air Quality Management District (BAAQMD) published its GHG thresholds.[1] Utilization of the

[1]The thresholds the BAAQMD adopted were called into question by a minute order issued January 9, 2012, in *California Building Industry Associated v. BAAQMD*, Alameda Superior Court Case No RG10548693. On March 5, 2012, the Alameda County Superior Court issued a judgment finding that the BAAQMD had failed to comply with CEQA when it adopted the thresholds. The court did not determine whether the thresholds were valid on the merits, but found that the adoption of the thresholds was a project under CEQA. The court issued a writ of mandate ordering the BAAQMD to set aside the thresholds and cease dissemination of them until the BAAQMD had complied with CEQA. The claim made in the case concerned the CEQA impacts of adopting the thresholds; that is, how the thresholds would affect land use development patterns. Those issues are not relevant to the scientific soundness of the BAAQMD's analysis of what levels of

BAAQMD's GHG threshold has been considered reasonable and appropriate by NSAQMD staff in the cases of recent environmental impact reports published in Nevada County, such as the Coldstream Specific Plan DEIR (Town of Truckee 2011) and the Rincon Del Rio DEIR (Nevada County 2012). If the proposed project would generate GHG emissions above the threshold level, it would be considered to contribute substantially to a cumulative impact and the impact would be considered significant. The proposed project would also be considered to have a significant impact if it would be in conflict with the AB 32 goals for reducing GHG emissions. This DEIR assesses the project's potential to result in a significant GHG impact by determining its consistency with the AB 32 Scoping Plan and Senate Bill 2X (Renewables Portfolio Standard), which both require 33 percent of supply from renewable energy sources by 2020. As stated previously, the AB 32 Scoping Plan contains the main strategies California is implementing to achieve reduction of 169 MMT of CO_2e, or approximately 30 percent from the State's projected 2020 emissions level of 596 MMT of CO_2e under a business-as-usual scenario.

METHODOLOGY

As stated above, the NSAQMD does not currently have an adopted threshold of significance for GHG emissions. In June 2010, the BAAQMD published its GHG thresholds in which projects resulting in more than 4.6 metric tons of CO_2e per service population (residents plus employees) per year are considered to result in a significant impact (BAAQMD 2011). The BAAQMD thresholds were chosen based on the substantial evidence that such thresholds represent quantitative and/or qualitative levels of GHG emissions, compliance with which means that the environmental impact of the GHG emissions will normally not be cumulatively considerable under CEQA (BAAQMD 2011). Compliance with such thresholds will be part of the solution to the cumulative GHG emissions problem, rather than hinder the State's ability to meet its goals of reduced statewide GHG emissions under AB 32. For the purposes of evaluating the proposed project's GHG impacts, emissions resulting from the potential extent of growth that could be supported upon future annexation of the two different SOIs proposed will be quantified and compared to the BAAQMD threshold of 4.6 metric tons of CO_2e per service population annually.

The project itself will also be compared with the strategies identified in the AB 32 Scoping Plan for a determination of consistency. This DEIR assesses the project's potential to result in a significant GHG impact by determining its consistency with the strategies contained with the AB 32 Scoping Plan and Renewables Portfolio Standard, which both require 33 percent of supply from renewable energy sources by 2020. In terms of electric service, since the proposed lands in the proposed SOI expansion under the District-preferred SOI scenario are currently within the service area of the energy provider Liberty Utilities, electrical use demand and electrical use–related GHG emissions are quantified for the maximum growth development potential of all proposed lands in the SOI expansion accounting for geographic location and the emission intensity factor for both Liberty Utilities and the TDPUD. In other words, for the purposes of projecting electrical energy demand and related GHG emissions that would result from the District-preferred SOI boundary, energy-source-derived emissions generated from the maximum growth development potential of the proposed SOI expansion under the District-preferred SOI scenario are quantified in consideration of both Liberty Utilities as the service provider and the TDPUD as the service provider.

The resultant GHG emissions of proposed project implementation were calculated using the California Emissions Estimator Model (CalEEMod), version 2011.1.1, computer program (see **Appendix 3.2-A**). The electrical service of the TDPUD will be compared with the strategies

pollutants should be deemed significant, or the threshold to use in assessing any air quality-related impact the project would have on the existing environment. These thresholds are based on substantial evidence identified in Appendix D of the Guidelines and are therefore used in this analysis.

identified in the AB 32 Scoping Plan for a determination of consistency, specifically Strategy E-3, Renewables Portfolio Standard (33 percent by 2020), which as previously stated requires 33 percent of supply from renewable energy sources by 2020. Specifically, the TDPUD's ability to comply with Strategy E-3 is evaluated in consideration of accommodating buildout of the proposed lands in the SOI expansion.

IMPACTS AND MITIGATION MEASURES

GHG Emissions (Standard of Significance 1)

Impact 3.2.1 The proposed project could result in a net increase in greenhouse gas emissions and could result in a significant impact on the environment. This impact is **cumulatively considerable.**

GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. The combination of GHG emissions from past, present, and future projects contributes substantially to the phenomenon of global climate change and its associated environmental impacts and as such is addressed only as a cumulative impact.

It is important to note that neither of the proposed scenarios—LAFCo-recommended or District-preferred—would specifically implement or directly result in the construction of any new facilities. Neither Nevada County LAFCo nor the TDPUD has any land use regulatory authority. The jurisdiction for land use matters for all of the land areas within the proposed SOIs would remain with either the Town of Truckee, Nevada County, Sierra County, or Placer County, and neither Nevada County LAFCo nor the TDPUD has the authority to facilitate future development in a manner different than is currently outlined by these jurisdictions in their applicable general plans. Furthermore, GHG emissions are already being generated by current land use activities.

LAFCo-Recommended Truckee Donner Public Utility District Sphere of Influence

Electric and Water Service

Table 3.3-3 in Section 3.3 of this DEIR identifies the extent of growth potential in the LAFCo-recommended SOI (near term and long term). The total development potential shown in **Table 3.3-3** does not factor existing development. It should be noted that some of this growth (rural development) could occur without the proposed update of the SOIs given that electric and water service can also be provided through wells or the Placer County Water Agency (Placer County only) and electrical service by private company service providers.

For the purposes of projecting GHG emissions that could result from the LAFCo-recommended SOI boundary, emissions generated from the maximum growth potential in the LAFCo-recommended SOI (near term and long term) are quantified.[2] Estimated GHG emissions resulting from these activities are summarized in **Table 3.2-4**.

[2] No aspect of the proposed project would specifically implement or directly result in the construction of any new facilities. Neither Nevada County LAFCo nor the TDPUD has any land use regulatory authority. The jurisdiction for land use matters for all of the land areas within the proposed SOIs would remain with either the Town of Truckee, Nevada County, Sierra County, or Placer County, and neither Nevada County LAFCo nor the TDPUD has the authority to facilitate future development in a manner different than is currently outlined by these jurisdictions in their applicable general plans.

TABLE 3.2-4
ESTIMATED GREENHOUSE GAS EMISSIONS – MAXIMUM GROWTH POTENTIAL IN LAFCO-RECOMMENDED SPHERE OF INFLUENCE (METRIC TONS PER YEAR)

Emissions Source	Carbon Dioxide (CO_2)	Methane (CH_4)	Nitrous Oxide (N_2O)	CO_2e
Area Source (landscaping, hearth)	1,967	0.82	0.08	2,010
Energy	4,803	0.13	0.06	4,825
Mobile	20,957	1.31	0.00	20,985
Waste	2,611	154	0.00	5,851
Water	2,634	33	0.85	3,599
Total	**32,972**	**190**	**0.99**	**37,270**

*Source: CalEEMod version 2011.1.1. The extent of growth potential in the LAFCo-recommended SOI (near term and long term) is projected at 839 residential units, 209,000 square feet of industrial building space, and 97,000 square feet of commercial building space per **Table 3.3-3** in Section 3.3. See **Appendix 3.2-1** for emission model outputs.*

Table 3.2-5 depicts the projected GHG emissions per service population for the project. The service population associated with the growth potential in the LAFCo-recommended SOI (near term and long term) was determined by estimating the number of potential residents and employees that would be accommodated with realization of the maximum growth potential in the LAFCo-recommended SOI. According to the Energy Information Administration (EIA; 1995), there is an average of one employee per 1,750 square feet of industrial building space and one employee per 900 square feet of commercial building space. Applying these ratios to the industrial and commercial square footage growth potential in the LAFCo-recommended SOI (near term and long term) results in 227 potential employees (209,000 square feet of industrial building space ÷ 1,750 = 119 and 97,000 square feet of commercial building space ÷ 900 = 108. 119 + 108 = 227). According to the California State Department of Finance (DOF; 2012), the average residential unit in the region houses 2.5 persons. The application of this ratio to the residential unit growth potential in the LAFCo-recommended SOI (near term and long term) equals 2,097 potential residents (839 x 2.5 = 2,097).

TABLE 3.2-5
LAFCO-RECOMMENDED TDPUD SPHERE OF INFLUENCE
GREENHOUSE GAS EMISSIONS PER SERVICE POPULATION

	Emissions	Jobs	Population	Service Population (SP)	$MTCO_2e$/SP/Year
Growth Potential in the LAFCo-Recommended SOI (Near Term and Long Term)	37,270	227	2,097	2,324	16.0

Based on the population and employment figures shown in **Table 3.2-5**, the projected service population associated with the maximum growth potential within the LAFCo-recommended SOI would be 2,324. Dividing the GHG emissions for this maximum growth potential yields a metric ton per service population ratio of 16.0.

District-Preferred Truckee Donner Public Utility District Sphere of Influence

Electric and Water Service

As previously described, the District-preferred SOI boundary proposes to maintain most of the area of the existing TDPUD Sphere of Influence for electric service in conjunction with an expansion of 3 square miles at the southeast corner of the existing SOI in Placer County (Northstar Load), the expansion of 23.5 square miles north of the existing SOI in Nevada County and Sierra County (Hobart Mills Load, Russell Valley Load, and Stampede Reservoir Generation Facility), and the reduction of 8 square miles of the existing SOI at its eastern edge in Nevada County (**Figure 2.0-3**). The District-preferred SOI for water service proposes to maintain the current SOI for water services. Therefore, the District-preferred SOI boundary would result in no change compared with the current SOI, and there is no potential for an expansion of water service facilities into any areas that have not been previously planned for development.

Tables 3.3-4 and **3.3-5** in Section 3.3 of this DEIR identify the extent of growth potential in the District-preferred SOI. The total development potential shown in these tables does not factor existing development. It should be noted that some of this growth (rural development) could occur without the proposed update of the SOIs given that electric and water service can also be provided through wells or the Placer County Water Agency (Placer County only) and electrical service by private company service providers.

For the purposes of projecting GHG emissions that could result from the District-preferred SOI boundary, emissions generated from the maximum growth potential in the District-preferred SOI are quantified based on the SOI for electric services as it is the largest SOI of the two.[3] Estimated GHG emissions resulting from these activities are summarized in **Table 3.2-6**.

TABLE 3.2-6
ESTIMATED GREENHOUSE GAS EMISSIONS – MAXIMUM GROWTH POTENTIAL IN DISTRICT-PREFERRED SPHERE OF INFLUENCE (METRIC TONS PER YEAR)

Emissions Source	Carbon Dioxide (CO_2)	Methane (CH_4)	Nitrous Oxide (N_2O)	CO_2e
Area Source (landscaping, hearth)	32,750	14	1.36	33,459
Energy	65,199	2	0.88	65,511
Mobile	275,126	17	0.00	275,483
Waste	5,517	272	0.00	10,347
Water	5,609	61	1.56	7,370
Total	**383,301**	**366**	**3.80**	**392,170**

*Source: CalEEMod version 2011.1.1. The extent of growth potential in the District-preferred SOI for electric service is projected at 13,908 residential units, 530,500 square feet of commercial building space, 209,000 square feet of industrial building space, and 44,600 square feet of office building space per **Table 3.3-3** in Section 3.3. See **Appendix 3.2-1** for emission model outputs.*

[3] No aspect of the proposed project would specifically implement or directly result in the construction of any new facilities. Neither Nevada County LAFCo nor the TDPUD has any land use regulatory authority. The jurisdiction for land use matters for all of the land areas within the proposed SOIs would remain with either the Town of Truckee, Nevada County, Placer County, or Sierra County, and neither Nevada County LAFCo nor the TDPUD has the authority to facilitate future development in a manner different than is currently outlined by these jurisdictions in their applicable general plans.

Table 3.2-7 depicts the projected GHG emissions per service population for the project. The service population associated with the growth potential in the District-preferred SOI was determined by estimating the number of potential residents and employees that would be accommodated with realization of the maximum growth potential in the District-preferred SOI. According to the EIA (1995), there is an average of one employee per 1,750 square feet of industrial building space, one employee per 900 square feet of commercial building space, and one employee per 387 square feet of office building space. Applying these ratios to the industrial, commercial, and office square footage growth potential in the District-preferred SOI results in 823 potential employees (209,000 square feet of industrial building space ÷ 1,750 = 119; 530,500 square feet of commercial building space ÷ 900 = 589; and 44,600 square feet of office building space ÷ 387 = 115. 119 + 589 + 115 = 823). According to the DOF (2012), the average residential unit in region houses 2.5 persons. The application of this ratio to the residential unit growth potential in the District-preferred SOI equals 34,917 potential residents (13,967 x 2.5 = 34,917).

TABLE 3.2-7
DISTRICT-PREFERRED SPHERE OF INFLUENCE
GREENHOUSE GAS EMISSIONS PER SERVICE POPULATION

	Emissions	Jobs	Population	Service Population (SP)	$MTCO_2e/SP/Year$
Growth Potential in District-Preferred SOI	392,170	342	34,917	35,740	11.0

Based on the population and employment figures shown in **Table 3.2-7**, the projected service population associated with the maximum growth potential within the District-preferred SOI would be 35,740. Dividing the GHG emissions for this maximum growth potential yields a metric ton per service population ratio of 11.0.

Summary of Environmental Effects of Greenhouse Gas Emissions for Both SOI Scenarios

As shown, realization of the maximum growth potential of both the LAFCo-recommended SOI and the District-preferred SOI would exceed the BAAQMD threshold of 4.6 metric tons of CO_2e per service population. Therefore, both the LAFCo-recommended SOI and the District-preferred SOI could result in a net increase in cumulative GHG emissions. The potential contribution to GHGs is thus considered **cumulatively considerable** and is a **significant and unavoidable** impact.

Mitigation Measures

While the new SOIs would not result in any new growth-related environmental impacts or an increased severity of the above identified significant environmental impacts (similar finding to CEQA Guidelines Section 15162), establishment of a new Sphere of Influence is the first step in a series of actions that support this planned growth. With the exception of not updating the SOI, there are no feasible mitigation measures available to Nevada County LAFCo to address this impact. Therefore, it would remain **significant and unavoidable**.

AB 32 Compliance (Standard of Significance 2)

Impact 3.2.2 Implementation of the proposed project could result in a net increase in greenhouse gas emissions, yet would not conflict with the goals of AB 32, and

thus would not result in a significant impact on the environment. This impact is **less than cumulatively considerable.**

The project is considered to have a significant impact if it would be in conflict with the AB 32 goals for reducing GHG emissions. In December 2008, CARB approved the AB 32 Scoping Plan outlining the State's strategy to achieve the 2020 GHG emissions limit. This Scoping Plan, developed by CARB in coordination with the Climate Action Team, proposes a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce dependence on oil, diversify California's energy sources, save energy, create new jobs, and enhance public health. The Scoping Plan contains a list of 39 recommended actions contained in plan Appendices C and E. This list is also provided in **Table 3.2-8**.

TABLE 3.2-8
RECOMMENDED ACTIONS OF CLIMATE CHANGE SCOPING PLAN

Measure Number	Measure Description
Transportation	
T-1	Pavley I and II – Light-Duty Vehicle Greenhouse Gas Standards
T-2	Low Carbon Fuel Standard (Discrete Early Action)
T-3	Regional Transportation-Related Greenhouse Gas Targets
T-4	Vehicle Efficiency Measures
T-5	Ship Electrification at Ports (Discrete Early Action)
T-6	Goods Movement Efficiency Measures. Ship Electrification at Ports System-Wide Efficiency Improvements
T-7	Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Measure – Aerodynamic Efficiency (Discrete Early Action)
T-8	Medium- and Heavy-Duty Vehicle Hybridization
T-9	High-Speed Rail
Electricity and Natural Gas	
E-1	Energy Efficiency (32,000 GWh of Reduced Demand) Increased Utility Energy Efficiency Programs More Stringent Building & Appliance Standards Additional Efficiency and Conservation Programs
E-2	Increase Combined Heat and Power Use by 30,000 GWh (net reductions include avoided transmission line loss)
E-3	Renewables Portfolio Standard (33% by 2020)
E-4	Million Solar Roofs (including California Solar Initiative, New Solar Homes Partnership, and solar programs of publicly owned utilities) Target of 3000 MW Total Installation by 2020
CR-1	Energy Efficiency (800 Million Therms Reduced Consumptions) Utility Energy Efficiency Programs Building and Appliance Standards Additional Efficiency and Conservation Programs

Measure Number	Measure Description
CR-2	Solar Water Heating (AB 1470 goal)
Green Buildings	
GB-1	Green Buildings
Water	
W-1	Water Use Efficiency
W-2	Water Recycling
W-3	Water System Energy Efficiency
W-4	Reuse Urban Runoff
W-5	Increase Renewable Energy Production
W-6	Public Goods Charge (Water)
Industry	
I-1	Energy Efficiency and Co-Benefits Audits for Large Industrial Sources
I-2	Oil and Gas Extraction GHG Emission Reduction
I-3	GHG Leak Reduction from Oil and Gas Transmission
I-4	Refinery Flare Recovery Process Improvements
I-5	Removal of Methane Exemption from Existing Refinery Regulations
Recycling and Waste Management	
RW-1	Landfill Methane Control (Discrete Early Action)
RW-2	Additional Reductions in Landfill Methane Increase the Efficiency of Landfill Methane Capture
RW-3	High Recycling/Zero Waste Commercial Recycling Increase Production and Markets for Compost Anaerobic Digestion Extended Producer Responsibility Environmentally Preferable Purchasing
Forests	
F-1	Sustainable Forest Target
High Global Warming Potential (GWP) Gases	
H-1	Motor Vehicle Air Conditioning Systems: Reduction of Refrigerant Emissions from Non-Professional Services (Discrete Early Action)
H-2	SF_6 Limits in Non-Utility and Non-Semiconductor Applications (Discrete Early Action)
H-3	Reduction of Perfluorocarbons in Semiconductor Manufacturing (Discrete Early Action)
H-4	Limit High GWP Use in Consumer Products Discrete Early Action (Adopted June 2008)

Measure Number	Measure Description
H-5	High GWP Reductions from Mobile Sources Low GWP Refrigerants for New Motor Vehicle Air Conditioning Systems Air Conditioner Refrigerant Leak Test During Vehicle Smog Check Refrigerant Recovery from Decommissioned Refrigerated Shipping Containers Enforcement of Federal Ban on Refrigerant Release during Servicing or Dismantling of Motor Vehicle Air Conditioning Systems
H-6	High GWP Reductions from Stationary Sources High GWP Stationary Equipment Refrigerant Management Program: Refrigerant Tracking/Reporting/Repair Deposit Program Specifications for Commercial and Industrial Refrigeration Systems Foam Recovery and Destruction Program SF Leak Reduction and Recycling in Electrical Applications Alternative Suppressants in Fire Protection Systems Residential Refrigeration Early Retirement Program
H-7	Mitigation Fee on High GWP Gases
Agriculture	
A-1	Methane Capture at Large Dairies

The strategies included in the Scoping Plan that apply to all future development, including the maximum development potential in both the LAFCo-recommended SOI and the District-preferred SOI, are contained in **Table 3.2-9**, which also summarizes the extent to which future development in Nevada County, Placer County, Sierra County, and the Town of Truckee would comply with the strategies to help California reach emissions reduction targets.

TABLE 3.2-9
AB 32 COMPLIANCE

Strategy	Project Compliance
Energy Efficiency Measures	
Energy Efficiency Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities). **Renewable Portfolio Standard** Achieve a 33 percent renewable energy mix statewide by 2020. **Green Building Strategy** Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Compliant** All future development in California, including that associated with the maximum development potential of both the LAFCo-recommended SOI and the District-preferred SOI, will comply with the updated Title 24 standards, including the new 2010 California Building Code (CBC), for building construction. These standards require new buildings to reduce water consumption by 20 percent, which results in less energy consumption for pumping water.

Strategy	Project Compliance
Water Conservation and Efficiency Measures	
Water Use Efficiency Continue efficiency programs and use cleaner energy sources to move and treat water. Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions.	**Compliant** As stated, all future development in California, including that associated with the maximum development potential of both the LAFCo-recommended SOI and the District-preferred SOI, will comply with the updated Title 24 standards, including the new 2010 California Building Code (CBC), for building construction. These standards require new buildings to reduce water consumption by 20 percent, which results in less energy consumption for pumping water.
Transportation and Motor Vehicle Measures	
Vehicle Climate Change Standards AB 1493 (Pavley) required the State to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles and light-duty trucks. Regulations were adopted by CARB in September 2004. **Light-Duty Vehicle Efficiency Measures** Implement additional measures that could reduce light-duty GHG emissions. For example, measures to ensure that tires are properly inflated can both reduce GHG emissions and improve fuel efficiency. **Adopt Heavy- and Medium-Duty Fuel and Engine Efficiency Measures** Regulations to require retrofits to improve the fuel efficiency of heavy-duty trucks that could include devices that reduce aerodynamic drag and rolling resistance. This measure could also include hybridization of and increased engine efficiency of vehicles. **Low Carbon Fuel Standard** CARB identified this measure as a Discrete Early Action Measure. This measure would reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020.	**Compliant** The project does not involve the manufacture of vehicles. However, vehicles that are purchased and used within the project site would comply with any vehicle and fuel standards that CARB adopts.
Regional Transportation-Related Greenhouse Gas Targets Develop regional GHG emissions reduction targets for passenger vehicles. Local governments will play a significant role in the regional planning process to reach passenger vehicle GHG emissions reduction targets. Local governments have the ability to directly influence both the siting and design of new residential and commercial developments in a way that reduces GHGs associated with vehicle travel.	**Compliant** Specific regional emission targets for transportation emissions do not directly apply to this project; regional GHG reduction target development is outside the scope of this project. The project will comply with any plans developed in Nevada County.

Strategy	Project Compliance
Measures to Reduce High Global Warming Potential (GWP) Gases CARB has identified Discrete Early Action measures to reduce GHG emissions from the refrigerants used in car air conditioners, semiconductor manufacturing, and consumer products. CARB has also identified potential reduction opportunities for future commercial and industrial refrigeration, changing the refrigerants used in auto air conditioning systems, and ensuring that existing car air conditioning systems do not leak.	**Compliant** New products used or serviced on the industrial land uses would comply with future CARB rules and regulations.
Forests	
Urban Forestry A statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	**Compliant** All future development associated with the maximum development potential of both the LAFCo-recommended SOI and the District-preferred SOI within unincorporated Nevada County will comply with Section L-II 4.2 – Community Design Standards, of the Nevada County Municipal Code. These design standards provide design interpretations for commercial, industrial, and residential development that address landscaping requirements. All future development associated with the maximum development potential of both the LAFCo-recommended SOI and the District-preferred SOI within Placer County will comply with the Placer County Landscape Design Guidelines. There is no development potential associated with the proposed SOI in Sierra County, as it is the County's intent to confine the extension of development-serving public facilities to Community Core Areas and Community Influence Areas within Sierra County. Areas outside the Community Core Areas or Community Influence Areas are intended to be maintained for natural resources. All future development associated with the maximum development potential of both the LAFCo-recommended SOI and the District-preferred SOI within the Town of Truckee will comply with Chapter 18.40, Landscape Standards, which provides standards for the location and types of landscaping to be provided in various areas of proposed developments, including setbacks, disturbed areas, parking areas, along streets, along property lines, and in buffer areas between incompatible uses. These standards also provide incentives for the preservation of native plants and trees.
Recycling and Waste Management	
High Recycling/Zero Waste Achieve 50 percent statewide Recycling Goal: Achieving the state's 50 percent waste diversion mandate as established by the Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy-intensive material extraction and production as well as methane emission from landfills.	**Compliant** All future development associated with the maximum development potential of both the LAFCo-recommended SOI and the District-preferred SOI is required to divert 50 percent of all solid waste from landfill facilities.

LAFCo-Recommended Truckee Donner Public Utility District Sphere of Influence

Electric and Water Service

The LAFCo-recommended SOI boundary omits lands in public ownership and those areas not expected or anticipated to be developed. The LAFCo-recommended boundary for the District's SOI would encompass an area that includes the Town of Truckee as well as developed areas adjacent to the town, which are under the jurisdiction of either Nevada County or Placer County (see **Figure 2.0-2**).

All future development associated with the maximum development potential of the LAFCo-recommended SOI would be subject to all applicable California state regulatory requirements, which would also reduce the GHG emissions. As shown in **Table 3.2-9,** future development would comply with the strategies to help California reach its emissions reduction targets.

District-Preferred Truckee Donner Public Utility District Sphere of Influence

Electric Service and Water Service

As previously described, the District-preferred SOI boundary proposes to maintain most of the area of the existing TDPUD Sphere of Influence for electric service in conjunction with an expansion of 3 square miles at the southeast corner of the existing SOI in Placer County (Northstar Load), the expansion of 23.5 square miles north of the existing SOI in Nevada County and Sierra County (Hobart Mills Load, Russell Valley Load, and Stampede Reservoir Generation Facility), and the reduction of 8 square miles of the existing SOI at its eastern edge in Nevada County (**Figure 2.0-3**). As with the maximum growth potential of the proposed LAFCo-recommended SOI, all future development associated with the maximum development potential of the District-preferred SOI would be subject to all applicable California state regulatory requirements. As shown in **Table 3.2-9,** future development would comply with the strategies to help California reach its GHG emissions reduction targets.

As previously stated, in terms of electric service, the lands in the proposed SOI expansion under the District-preferred SOI scenario are currently within the service area of the energy provider Liberty Utilities. Therefore, for the purposes of this analysis, electrical use demand and electrical use–related GHG emissions were quantified for the maximum growth potential of all proposed lands in the SOI expansion under the District-preferred SOI scenario accounting for geographic location and the emission intensity factor for both Liberty Utilities and the TDPUD. Both Liberty Utilities' ability and the TDPUD's ability to comply with AB 32 Scoping Plan Strategy E-3, Renewables Portfolio Standard, were evaluated in consideration of accommodating the maximum growth potential of the proposed lands in the SOI expansion. In other words, for the intent of projecting electrical energy demand and related GHG emissions that would result from the District-preferred SOI boundary, energy-source-derived emissions generated from the maximum growth development potential of the proposed SOI expansion under the District-preferred SOI scenario are quantified in consideration of both Liberty Utilities as the service provider and the TDPUD as the service provider.[4]

[4] No aspect of the proposed project would specifically implement or directly result in the construction of any new facilities. Neither Nevada County LAFCo nor the TDPUD has any land use regulatory authority. The jurisdiction for land use matters for all of the land areas within the proposed SOIs would remain with either the Town of Truckee, Nevada County, Sierra County, or Placer County, and neither Nevada County LAFCo nor the TDPUD has the authority to facilitate future development in a manner different than is currently outlined by these jurisdictions in their applicable general plans.

Tables 3.1-2 and **3.1-3** in Section 3.1 of this DEIR identify the extent of growth potential in the District-preferred SOI. The total development potential shown in these tables does not factor existing development. Estimated electrical energy use and related electrical energy-use emissions resulting from these activities are summarized in **Tables 3.2-10** and **3.2-11**.

Table 3.2-10 identifies electrical energy use and associated GHG emissions for the maximum growth potential in the District-preferred SOI assuming Liberty Utilities, the current service provider for these areas, remains the electrical service provider.

TABLE 3.2-10
MAXIMUM GROWTH POTENTIAL IN DISTRICT-PREFERRED SOI
ELECTRICAL ENERGY DEMAND AND GREENHOUSE GAS EMISSIONS (METRIC TONS PER YEAR) –
LIBERTY UTILITIES AS SERVICE PROVIDER

Land Use Buildout Assumptions[1]	Electrical Energy Demand (KWh)	CO_2e (metric tons annually)[2]
• 13,967 residential units • 530,500 square feet of commercial building space • 209,000 square feet of industrial building space • 44,600 square feet of office building space	95,230,021	67,837

Notes: Energy demand and emissions quantified by PMC with CalEEMod (see Appendix 3.2-A). Quantified energy demand and emissions do not include snowmaking activities.
[1] Maximum growth potential assumptions derived from Table 3.1-2 of Section 3.1.
[2] Emission intensity factor based on utility provider, Sierra Pacific Resources defaults. Nevada Power, Sierra Pacific Power, and Sierra Pacific Resources merged in July 1999 to create a subsidiary of NV Energy, also known as Liberty Utilities.

Table 3.2-11 identifies electrical energy use and associated GHG emissions for the maximum potential growth in the District-preferred SOI assuming the TDPUD as the electrical service provider, as proposed under the District-preferred Sphere of Influence boundary scenario.

TABLE 3.2-11
MAXIMUM GROWTH POTENTIAL IN DISTRICT-PREFERRED SOI
ELECTRICAL ENERGY DEMAND AND GREENHOUSE GAS EMISSIONS (METRIC TONS PER YEAR) –
TRUCKEE DONNER PUBLIC UTILITY DISTRICT AS SERVICE PROVIDER

Land Use Buildout Assumptions[1]	Electrical Energy Demand (KWh)	CO_2e (metric tons annually)[2]
• 13,967 residential units • 530,500 square feet of commercial building space • 209,000 square feet of industrial building space • 44,600 square feet of office building space	95,230,021	45,130

Notes: Emissions quantified by PMC with CalEEMod (see Appendix 3.2-A).
[1] Maximum growth potential assumptions derived from Table 3.1-2 of Section 3.1.
[2] Emission intensity factor based on utility provider statewide average defaults due to lack of specific TDPUD factors in modeling software.

As shown in **Table 3.2-10**, under the current electric energy provider, Liberty Utilities, the maximum growth potential in the District-preferred SOI results in an annual electrical energy demand of 95,230,021 kilowatt-hours as well as 67,837 metric tons of CO_2e. As shown in **Table 3.2-11**, under the proposed District-preferred SOI boundary, the maximum growth potential in

the District-preferred SOI would result in an annual electrical energy demand of 95,230,021 kilowatt-hours and 44,130 metric tons of CO_2e.

Table 3.2-12 identifies the most recently available electric energy demand information of both Liberty Utilities and the TDPUD as well as the current renewable energy mix for each utility company. As stated in Section 2.0, Project Description, the TDPUD currently serves approximately 13,000 electricity customers, and according to the California Public Utility Commission (CPUC; 2012a), Liberty Utility currently serves approximately 49,000 customers in California.

TABLE 3.2-12
TOTAL ELECTRIC ENERGY DEMAND AND RENEWABLE ENERGY MIX – LIBERTY UTILITIES AND TRUCKEE DONNER PUBLIC UTILITY DISTRICT

Electric Service Provider	Total Energy Demand (Annual KWh)	Renewable Energy Mix Percentage	Renewable KWh Annually
Liberty Utilities (current provider)	564,909,525[1]	20%[3]	112,981,905
TDPUD	156,694,902[2]	22%[4]	34,472,878

Sources: [1] CPUC 2012b; total energy demand is projected for Year 2013. [2] CEC 2010; total energy demand for Year 2010. [3] Smart 2012. [4] CEC 2012

As shown in **Table 3.2-12**, Liberty Utilities has a total energy demand of 564,909,525 kilowatt-hours annually, of which 20 percent is supplied from renewable energy sources. The TDPUD has a total energy demand of 156,694,902 kilowatt-hours annually, of which 22 percent is supplied from renewable energy sources.

As previously stated, the TDPUD proposes to expand its SOI. The expansion of TDPUD's electrical service area to include the lands within the District-preferred SOI could potentially add an additional energy demand of 95,230,021 kilowatt-hours to the TDPUD's current energy demand of 156,694,902 kilowatt-hours annually, for a total annual energy demand of 251,924,923 kilowatt-hours. Such an immediate addition of energy demand would reduce the TDPUD's current renewable energy mix percentage to 14 percent. However, such a scenario is not likely because a majority of the lands within the proposed expansion area into the TDPUD SOI are currently not developed and are not anticipated to be fully development at any time in the intermediate future.

The Renewables Portfolio Standard program requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020. According to the CEC, the TDPUD is projected to sell 176,383,000 kilowatt-hours of electricity annually by the year 2020 and is expected to be able to deliver approximately 72,619,000 kilowatt-hours of renewable energy annually by the year 2020 (CEC 2011). Therefore, the potential for the TDPUD to add the additional energy demand, under the District-preferred SOI boundary, of 95,230,021 kilowatt-hours to its projected 2020 demand would result in a TDPUD renewable energy mix of 29 percent (176,383,000 + 95,230,021 = 251,924,923. 72,619,000 ÷ 251,924,923 = 0.29), which is 4 percentage points below the mandated 33 percent or 10,516,224 kilowatt-hours of renewable energy, based on projections.

The purchase power contract involving Liberty Utilities' supply of electricity to its California customers guarantees the delivery of a specific and minimum verifiable amount of renewable energy (Smart 2012). The amount of guaranteed renewable energy for 2012 and 2013 is 20 percent (Smart 2012). The amount of renewable energy mix supplied to Liberty Utilities' California customers in 2014 is set at 21.7 percent, and in 2015 the renewable mix percentage is

contractually set at 23.3 percent (Smart 2012). A new renewable energy mix requirements contract has yet to be established for years beyond 2015.

The CPUC implements and administers the Renewables Portfolio Standard program in collaboration and cooperation with the CEC and other agencies. The CPUC and the CEC monitor Renewables Portfolio Standard goals and results, including compliance reviews and enforcement, as necessary (CPUC 2011). These entities also require that electrical service providers prepare a renewable energy procurement plan and update that plan when necessary (CPUC 2011). The CPUC and the CEC review Renewables Portfolio Standard procurement plans for each electric utility provider and accept, reject, or modify the plans. Also, the CPUC and the CEC oversee electrical utility providers' Renewables Portfolio Standard solicitations for renewable energy, review the results of solicitations submitted for approval by an electrical utility, and accept or reject proposed contracts based on consistency with the approved procurement plan.

As previously stated, in the case of Liberty Utilities, a new renewable energy mix requirements contract concerning its supply of electricity to its California customers has yet to be established for years beyond 2015. Also as stated above, the potential for the TDPUD to add an additional energy demand of 95,230,021 kilowatt-hours to its projected 2020 demand would result in a TDPUD renewable energy mix of 29 percent, which is 4 percentage points below the mandated 33 percent or 10,516,224 kilowatt-hours of renewable energy. However, both electric service providers are overseen, through the requirement of submitting renewable energy procurement plans, by the CPUC and the CEC, which accept, reject, or modify these procurement plans as needed and review the results of solicitations submitted for approval by an electrical utility, such as Liberty Utilities and/or the TDPUD, and accept or reject proposed contracts based on consistency with the approved procurement plan. In addition, the Renewables Portfolio Standard program specifically excludes local publicly owned electric utilities like the TDPUD from the definition of "retail seller" (CEC 2008). Instead, local publicly owned electric utilities, such as the TDPUD, are required to implement a Renewables Portfolio Standard but are given flexibility in developing utility-specific targets, timelines, and resource eligibility rules (CEC 2008). Therefore, a TDPUD renewable energy mix of 29 percent in the year 2020 does not necessarily represent a lack of compliance with the Renewables Portfolio Standard program.

For these reasons, the District-preferred SOI boundary scenario would not conflict with AB 32 goals for reducing GHG emissions. Both Liberty Utilities and the TDPUD are expected to achieve the mandated requirements of the Renewables Portfolio Standard program regardless of their respective Spheres of Influence due to CPUC and CEC oversight.

As previously stated, all future development associated with the maximum development potential of both the LAFCo-recommended SOI and the District-preferred SOI would be subject to all applicable California state regulatory requirements, which would also reduce the GHG emissions. As shown in **Table 3.2-9,** future development would comply with the strategies to help California reach the emissions reduction targets under the AB 32 Scoping Plan. Furthermore, the District-preferred SOI boundary scenario would not conflict with AB 32 goals for reducing GHG emissions, since both Liberty Utilities and the TDPUD are expected to achieve the mandated requirements of the Renewables Portfolio Standard program regardless of their respective SOIs due to CPUC and CEC oversight. This impact is therefore **less than cumulatively considerable**.

Mitigation Measures

None required.

REFERENCES

BAAQMD (Bay Area Air Quality Management District). 2011. *California Environmental Quality Act Guidelines.*

California Climate Action Registry. 2009. *California Climate Action Registry General Reporting Protocol Version 3.1.*

CARB (California Air Resources Board). 2010. *California Greenhouse Gas Inventory for 2000–2008.* http://www.arb.ca.gov/cc/inventory/data/data.htm.

CEC (California Energy Commission). 2008. *The Progress of California's Publicly Owned Utilities in Implementing Renewables Portfolio Standards.*

———. 2010. "Energy Consumption Data Management System: Energy Consumption by Entity." http://ecdms.energy.ca.gov/elecbyutil.aspx.

———. 2011. Updated Publicly Owned Utilities Database as of November 2011. http://www.energy.ca.gov/2008publications/CEC-300-2008-005/index.html.

———. 2012. "Utility Annual Power Content Label for 2010." http://www.energy.ca.gov/sb1305/labels/.

CNRA (California Natural Resources Agency). 2009. *2009 California Climate Adaptation Strategy*.

CPUC (California Public Utilities Commission). 2011. *Order Instituting Rulemaking Regarding Implementation and Administration of the Renewables Portfolio Standard Program.*

CPUC (California Public Utilities Commission), Division of Ratepayer Advocates. 2012a. *Report on the Results of Operations for California Pacific Electric Company General Rate Case Test Year 2013 – Customer Accounts, Customer Service & Information Expenses.*

———. 2012b. *Report on the Results of Operations for California Pacific Electric Company General Rate Case Test Year 2013 – Sales, Customers, Revenues, and Depreciation.*

DOF (California Department of Finance). 2012. *Population and Housing Estimates for Cities, Counties, and the State, January 2011 and 2012, with 2010 Benchmark*.

EFCTC (European Fluorocarbons Technical Committee). 2003. *Fluorocarbons and Sulphur Hexafluoride: Perfluorocarbons (PFCs) Fact Sheet*.

EIA (Energy Information Administration). 1995. *How Many Employees Are There? – Commercial Buildings.* http://www.eia.gov/emeu/consumptionbriefs/cbecs/pbawebsite/retailserv/retserv_howmanyempl.htm.

EPA (US Environmental Protection Agency). 2008. "SF6 Emission Reduction Partnership for Electric Power Systems: Basic Information." http://www.epa.gov/electricpower-sf6/basic.html.

———. 2010a. "Nitrous Oxide." http://www.epa.gov/nitrousoxide/scientific.html.

———. 2010b. "High Global Warming Potential Gases." http://epa.gov/highgwp/.

———. 2010c. *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2008.*

———. 2010d. *PSD and Title V Permitting Guidance for Greenhouse Gases*.

———. 2011a. "Climate Change – Greenhouse Gas Emissions: Carbon Dioxide." http://www.epa.gov/climatechange/emissions/co2.html.

———. 2011b. "Methane." http://www.epa.gov/methane/scientific.html.

Nevada County. 1994. *Nevada County General Plan* (amended through 2010).

———. 1995. *Nevada County General Plan Draft Environmental Impact Report.*

———. 1997. *Nevada County Zoning District Map 135.* http://www.mynevadacounty.com/nc/igs/gis/docs/GIS%20Maps%20(Public)/Zoning%20Maps%20(Public)/Zoning%20District%20Map%20ZDM%20Pages%20in%20B%20and%20W/ZDM%20135.pdf.

———. 2012. *Rincon Del Rio Draft Environmental Impact Report (SCH No. 2011052030)*. January 2011.

Placer County. 1994. *Placer County General Plan.*

———. 2003a. *Martis Valley Community Plan*.

———. 2003b. *Martis Valley Community Plan Final Environmental Impact Report*.

Sierra County. 1996. *Sierra County General Plan*.

Smart, Michael. 2012. President, Liberty Utilities West. E-mail communication with PMC. August 16.

Truckee, Town of. 2005. *Town of Truckee 2025 General Plan.*

———. 2006. *Town of Truckee 2025 General Plan Draft Environmental Impact Report*.

———. 2011. *Coldstream Specific Plan Draft Environmental Impact Report, Volume 1 (SCH No. 2009062029)*.

Nevada LAFCo Recommended TDPUD Sphere of Influence

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
Single Family Housing	839	Dwelling Unit
Strip Mall	97	1000sqft
General Light Industry	209	1000sqft

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**		**Utility Company**	Statewide Average
Climate Zone	14		2.2		
		Precipitation Freq (Days)			

2.0 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area											866.65	1,100.67	1,967.33	0.82	0.08	2,009.91
Energy											0.00	4,802.51	4,802.51	0.13	0.06	4,825.07
Mobile											0.00	20,957.19	20,957.19	1.31	0.00	20,984.75
Waste											2,610.71	0.00	2,610.71	154.29	0.00	5,850.76
Water											0.00	2,634.39	2,634.39	33.34	0.85	3,599.44
Total											**3,477.36**	**29,494.76**	**32,972.13**	**189.89**	**0.99**	**37,269.93**

3.0 Mobile Detail

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated											0.00	20,957.19	20,957.19	1.31	0.00	20,984.75
Unmitigated											0.00	20,957.19	20,957.19	1.31	0.00	20,984.75
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

3.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Light Industry	1,456.73	275.88	142.12	4,250,723	4,250,723
Single Family Housing	8,029.23	8,457.12	7358.03	28,557,203	28,557,203
Strip Mall	4,299.04	4,077.88	1981.71	6,282,370	6,282,370
Total	13,785.00	12,810.88	9,481.86	39,090,296	39,090,296

3.3 Trip Type Information

	Miles			Trip %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW
General Light Industry	14.70	6.60	6.60	59.00	28.00	13.00
Single Family Housing	16.80	7.10	7.90	37.30	20.70	42.00
Strip Mall	14.70	6.60	6.60	16.60	64.40	19.00

4.0 Energy Detail

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated											0.00	3,523.60	3,523.60	0.11	0.04	3,538.37
Electricity Unmitigated											0.00	3,523.60	3,523.60	0.11	0.04	3,538.37
NaturalGas Mitigated											0.00	1,278.91	1,278.91	0.02	0.02	1,286.69
NaturalGas Unmitigated											0.00	1,278.91	1,278.91	0.02	0.02	1,286.69
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

4.1 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU	tons/yr										MT/yr					
General Light Industry	769120											0.00	41.04	41.04	0.00	0.00	41.29
Single Family Housing	2.24605e+007											0.00	1,198.58	1,198.58	0.02	0.02	1,205.87
Strip Mall	736230											0.00	39.29	39.29	0.00	0.00	39.53
Total												**0.00**	**1,278.91**	**1,278.91**	**0.02**	**0.02**	**1,286.69**

4.2 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
General Light Industry	988570					429.79	0.01	0.00	431.60
Single Family Housing	5.62808e+006					2,446.88	0.07	0.03	2,457.14
Strip Mall	1.48798e+006					646.92	0.02	0.01	649.63
Total						**3,523.59**	**0.10**	**0.04**	**3,538.37**

5.0 Area Detail

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated											866.65	1,100.67	1,967.33	0.82	0.08	2,009.91
Unmitigated											866.65	1,100.67	1,967.33	0.82	0.08	2,009.91
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

5.1 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating											0.00	0.00	0.00	0.00	0.00	0.00
Consumer Products											0.00	0.00	0.00	0.00	0.00	0.00
Hearth											866.65	1,090.38	1,957.03	0.81	0.08	1,999.39
Landscaping											0.00	10.29	10.29	0.01	0.00	10.53
Total											**866.65**	**1,100.67**	**1,967.32**	**0.82**	**0.08**	**2,009.92**

6.0 Water Detail

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr				MT/yr			
Mitigated					2,634.39	33.34	0.85	3,599.44
Unmitigated					2,634.39	33.34	0.85	3,599.44
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

6.1 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	tons/yr				MT/yr			
General Light Industry	1027.64 / 0					2,429.06	31.44	0.81	3,339.08
Single Family Housing	54.6642 / 34.4622					181.65	1.67	0.04	230.28
Strip Mall	7.18503 / 4.40373					23.68	0.22	0.01	30.08
Total						**2,634.39**	**33.33**	**0.86**	**3,599.44**

7.0 Waste Detail

Category/Year

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
	tons/yr				MT/yr			
Mitigated					2,610.71	154.29	0.00	5,850.76
Unmitigated					2,610.71	154.29	0.00	5,850.76
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

7.1 Waste by Land Use

Unmitigated

	Waste Disposed	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	tons	tons/yr				MT/yr			
General Light Industry	12159.4					2,468.24	145.87	0.00	5,531.48
Single Family Housing	600					121.79	7.20	0.00	272.95
Strip Mall	101.85					20.67	1.22	0.00	46.33
Total						**2,610.70**	**154.29**	**0.00**	**5,850.76**

District Preferred TDPUD Sphere of Influence - Nonresidential

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
Strip Mall	530.5	1000sqft
General Light Industry	209	1000sqft
General Office Building	44.6	1000sqft

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**		**Utility Company**	Statewide Average
Climate Zone	14		2.2		
		Precipitation Freq (Days)			
			72		

2.0 Emissions Summary

2.1 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area											0.00	0.00	0.00	0.00	0.00	0.00
Energy											0.00	4,512.16	4,512.16	0.13	0.05	4,531.66
Mobile											0.00	21,874.75	21,874.75	1.52	0.00	21,906.59
Waste											2,589.73	0.00	2,589.73	153.05	0.00	5,803.75
Water											0.00	2,584.72	2,584.72	32.89	0.84	3,536.75
Total											**2,589.73**	**28,971.63**	**31,561.36**	**187.59**	**0.89**	**35,778.75**

3.0 Mobile Detail

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated											0.00	21,874.75	21,874.75	1.52	0.00	21,906.59
Unmitigated											0.00	21,874.75	21,874.75	1.52	0.00	21,906.59
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

3.1 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Light Industry	1,456.73	275.88	142.12	4,250,723	4,250,723
General Office Building	491.05	105.70	43.71	1,027,278	1,027,278
Strip Mall	23,511.76	22,302.22	10838.12	34,358,734	34,358,734
Total	25,459.54	22,683.80	11,023.94	39,636,735	39,636,735

3.2 Trip Type Information

	Miles			Trip %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW
General Light Industry	14.70	6.60	6.60	59.00	28.00	13.00
General Office Building	14.70	6.60	6.60	33.00	48.00	19.00
Strip Mall	14.70	6.60	6.60	16.60	64.40	19.00

4.0 Energy Detail

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated											0.00	4,207.32	4,207.32	0.13	0.05	4,224.96
Electricity Unmitigated											0.00	4,207.32	4,207.32	0.13	0.05	4,224.96
NaturalGas Mitigated											0.00	304.85	304.85	0.01	0.01	306.70
NaturalGas Unmitigated											0.00	304.85	304.85	0.01	0.01	306.70
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

4.1 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU	tons/yr										MT/yr					
General Light Industry	769120											0.00	41.04	41.04	0.00	0.00	41.29
General Office Building	916976											0.00	48.93	48.93	0.00	0.00	49.23
Strip Mall	4.0265e+006											0.00	214.87	214.87	0.00	0.00	216.18
Total												**0.00**	**304.84**	**304.84**	**0.00**	**0.00**	**306.70**

4.2 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
General Light Industry	988570					429.79	0.01	0.00	431.60
General Office Building	550810					239.47	0.01	0.00	240.48
Strip Mall	8.13787e+006					3,538.05	0.11	0.04	3,552.89
Total						**4,207.31**	**0.13**	**0.04**	**4,224.97**

5.0 Area Detail

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated											0.00	0.00	0.00	0.00	0.00	0.00
Unmitigated											0.00	0.00	0.00	0.00	0.00	0.00
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

5.1 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating											0.00	0.00	0.00	0.00	0.00	0.00
Consumer Products											0.00	0.00	0.00	0.00	0.00	0.00
Landscaping											0.00	0.00	0.00	0.00	0.00	0.00
Total											**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

6.0 Water Detail

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr				MT/yr			
Mitigated					2,584.72	32.89	0.84	3,536.75
Unmitigated					2,584.72	32.89	0.84	3,536.75
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

6.1 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	tons/yr				MT/yr			
General Light Industry	1027.64 / 0					2,429.06	31.44	0.81	3,339.08
General Office Building	7.92693 / 4.85844					26.13	0.24	0.01	33.18
Strip Mall	39.2955 / 24.0843					129.53	1.20	0.03	164.48
Total						**2,584.72**	**32.88**	**0.85**	**3,536.74**

7.0 Waste Detail

Category/Year

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
	tons/yr				MT/yr			
Mitigated					2,589.73	153.05	0.00	5,803.75
Unmitigated					2,589.73	153.05	0.00	5,803.75
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

7.1 Waste by Land Use

Unmitigated

	Waste Disposed	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	tons	tons/yr				MT/yr			
General Light Industry	12159.4					2,468.24	145.87	0.00	5,531.48
General Office Building	41.48					8.42	0.50	0.00	18.87
Strip Mall	557.02					113.07	6.68	0.00	253.40
Total						**2,589.73**	**153.05**	**0.00**	**5,803.75**

District Preferred TDPUD Sphere of Influence - Electric Service Residential

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
Single Family Housing	13908	Dwelling Unit

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**		**Utility Company**	Statewide Average
Climate Zone	14		2.2		
		Precipitation Freq (Days)			
			72		

2.0 Emissions Summary

2.1 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5		Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr									MT/yr					
Area										14,366.38	18,245.75	32,612.12	13.68	1.35	33,318.10
Energy										0.00	60,430.39	60,430.39	1.61	0.83	60,721.38
Mobile										0.00	252,180.99	252,180.99	15.42	0.00	252,504.80
Waste										2,018.59	0.00	2,018.59	119.30	0.00	4,523.80
Water										0.00	3,011.21	3,011.21	27.75	0.72	3,817.31
Total										**16,384.97**	**333,868.34**	**350,253.30**	**177.76**	**2.90**	**354,885.39**

3.0 Mobile Detail

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr									MT/yr					
Mitigated										0.00	252,180.99	252,180.99	15.42	0.00	252,504.80
Unmitigated										0.00	252,180.99	252,180.99	15.42	0.00	252,504.80
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

3.1 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Single Family Housing	133,099.56	140,192.64	121973.16	473,389,254	473,389,254
Total	133,099.56	140,192.64	121,973.16	473,389,254	473,389,254

3.2 Trip Type Information

	Miles				Trip %	
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW
Single Family Housing	16.80	7.10	7.90	37.30	20.70	42.00

4.0 Energy Detail

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr									MT/yr					
Electricity Mitigated										0.00	40,561.71	40,561.71	1.23	0.47	40,731.79
Electricity Unmitigated										0.00	40,561.71	40,561.71	1.23	0.47	40,731.79
NaturalGas Mitigated										0.00	19,868.68	19,868.68	0.38	0.36	19,989.59
NaturalGas Unmitigated										0.00	19,868.68	19,868.68	0.38	0.36	19,989.59
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

4.1 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Exhaust PM2.	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU	tons/yr									MT/yr					
Single Family Housing	3.72325e+008										0.00	19,868.68	19,868.68	0.38	0.36	19,989.59
Total											**0.00**	**19,868.68**	**19,868.68**	**0.38**	**0.36**	**19,989.59**

4.2 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O
Land Use	kWh	tons/yr				MT/yr		
Single Family Housing	9.3296e+007					40,561.71	1.23	0.47
Total						**40,561.71**	**1.23**	**0.47**

5.0 Area Detail

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr									MT/yr					
Mitigated										14,366.38	18,245.75	32,612.12	13.68	1.35	33,318.10
Unmitigated										14,366.38	18,245.75	32,612.12	13.68	1.35	33,318.10
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

5.1 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr									MT/yr					
Architectural Coating										0.00	0.00	0.00	0.00	0.00	0.00
Consumer Products										0.00	0.00	0.00	0.00	0.00	0.00
Hearth										14,366.38	18,075.15	32,441.52	13.49	1.35	33,143.58
Landscaping										0.00	170.60	170.60	0.19	0.00	174.53
Total										**14,366.38**	**18,245.75**	**32,612.12**	**13.68**	**1.35**	**33,318.11**

6.0 Water Detail

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr				MT/yr			
Mitigated					3,011.21	27.75	0.72	3,817.31
Unmitigated					3,011.21	27.75	0.72	3,817.31
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

6.1 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O
Land Use	Mgal	tons/yr				MT/yr		
Single Family Housing	906.162 / 571.276					3,011.21	27.75	0.72
Total						**3,011.21**	**27.75**	**0.72**

7.0 Waste Detail

Category/Year

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
	tons/yr				MT/yr			
Mitigated					2,018.59	119.30	0.00	4,523.80
Unmitigated					2,018.59	119.30	0.00	4,523.80
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

7.1 Waste by Land Use

Unmitigated

	Waste Disposed	ROG	NOx	CO	SO2	Total CO2	CH4	N2O
Land Use	tons	tons/yr				MT/yr		
Single Family Housing	9944.25					2,018.59	119.30	0.00
Total						**2,018.59**	**119.30**	**0.00**

District Preferred TDPUD Sphere of Influence - Water Service Additional Residential

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
Single Family Housing	59	Dwelling Unit

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**		**Utility Company**	Statewide Average
Climate Zone	14		2.2		
		Precipitation Freq (Days)			
			72		

2.0 Emissions Summary

2.1 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area											60.94	77.40	138.35	0.06	0.01	141.34
Energy											0.00	256.36	256.36	0.01	0.00	257.59
Mobile											0.00	1,069.79	1,069.79	0.07	0.00	1,071.17
Waste											8.58	0.00	8.58	0.51	0.00	19.22
Water											0.00	12.77	12.77	0.12	0.00	16.19
Total											**69.52**	**1,416.32**	**1,485.85**	**0.77**	**0.01**	**1,505.51**

3.0 Mobile Detail

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated											0.00	1,069.79	1,069.79	0.07	0.00	1,071.17
Unmitigated											0.00	1,069.79	1,069.79	0.07	0.00	1,071.17
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

3.1 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Single Family Housing	564.63	594.72	517.43	2,008,194	2,008,194
Total	564.63	594.72	517.43	2,008,194	2,008,194

3.2 Trip Type Information

	Miles			Trip %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW
Single Family Housing	16.80	7.10	7.90	37.30	20.70	42.00

4.0 Energy Detail

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated											0.00	172.07	172.07	0.01	0.00	172.79
Electricity Unmitigated											0.00	172.07	172.07	0.01	0.00	172.79
NaturalGas Mitigated											0.00	84.29	84.29	0.00	0.00	84.80
NaturalGas Unmitigated											0.00	84.29	84.29	0.00	0.00	84.80
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

4.1 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU	tons/yr										MT/yr					
Single Family Housing	1.57946e+006											0.00	84.29	84.29	0.00	0.00	84.80
Total												**0.00**	**84.29**	**84.29**	**0.00**	**0.00**	**84.80**

4.2 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
Single Family Housing	395777					172.07	0.01	0.00	172.79
Total						**172.07**	**0.01**	**0.00**	**172.79**

5.0 Area Detail

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated											60.94	77.40	138.35	0.06	0.01	141.34
Unmitigated											60.94	77.40	138.35	0.06	0.01	141.34
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

5.1 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating											0.00	0.00	0.00	0.00	0.00	0.00
Consumer Products											0.00	0.00	0.00	0.00	0.00	0.00
Hearth											60.94	76.68	137.62	0.06	0.01	140.60
Landscaping											0.00	0.72	0.72	0.00	0.00	0.74
Total											**60.94**	**77.40**	**138.34**	**0.06**	**0.01**	**141.34**

6.0 Water Detail

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr				MT/yr			
Mitigated					12.77	0.12	0.00	16.19
Unmitigated					12.77	0.12	0.00	16.19
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

6.1 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	tons/yr				MT/yr			
Single Family Housing	3.84409 / 2.42345					12.77	0.12	0.00	16.19
Total						**12.77**	**0.12**	**0.00**	**16.19**

7.0 Waste Detail

Category/Year

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
	tons/yr				MT/yr			
Mitigated					8.58	0.51	0.00	19.22
Unmitigated					8.58	0.51	0.00	19.22
Total	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**

7.1 Waste by Land Use

Unmitigated

	Waste Disposed	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	tons	tons/yr				MT/yr			
Single Family Housing	42.25					8.58	0.51	0.00	19.22
Total						**8.58**	**0.51**	**0.00**	**19.22**

Liberty Energy as Service Provider - District Preferred TDPUD Sphere of Influence - Nonresidential - Electricity Emissions

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
General Office Building	44.6	1000sqft
General Light Industry	209	1000sqft
Strip Mall	530.5	1000sqft

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**		**Utility Company**	Sierra Pacific Resources
Climate Zone	14		2.2		
		Precipitation Freq (Days)			
			72		

2.0 Emissions Summary

2.1 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
General Light Industry	988570					646.95	0.01	0.00	648.76
General Office Building	550810					360.47	0.01	0.00	361.47
Strip Mall	8.13787e+006					5,325.70	0.11	0.04	5,340.53
Total						**6,333.12**	**0.13**	**0.04**	**6,350.76**

Liberty Energy as Service Provider - District Preferred TDPUD Sphere of Influence - Electric Service Residential - Electricity Emissions

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
Single Family Housing	13908	Dwelling Unit

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	2.2	**Utility Company**	Sierra Pacific Resources
Climate Zone	14	**Precipitation Freq (Days)**	72		

2.0 Emissions Summary

2.1 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
Single Family Housing	9.3296e+007					61,056.06	1.23	0.47	61,226.14
Total						**61,056.06**	**1.23**	**0.47**	**61,226.14**

Liberty Energy as Service Provider - District Preferred TDPUD Sphere of Influence - Water Service Additional Residential - Electricity Emissions

Northern Sierra AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
Single Family Housing	59	Dwelling Unit

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	2.2	**Utility Company**	Sierra Pacific Resources
Climate Zone	14	**Precipitation Freq (Days)**	72		

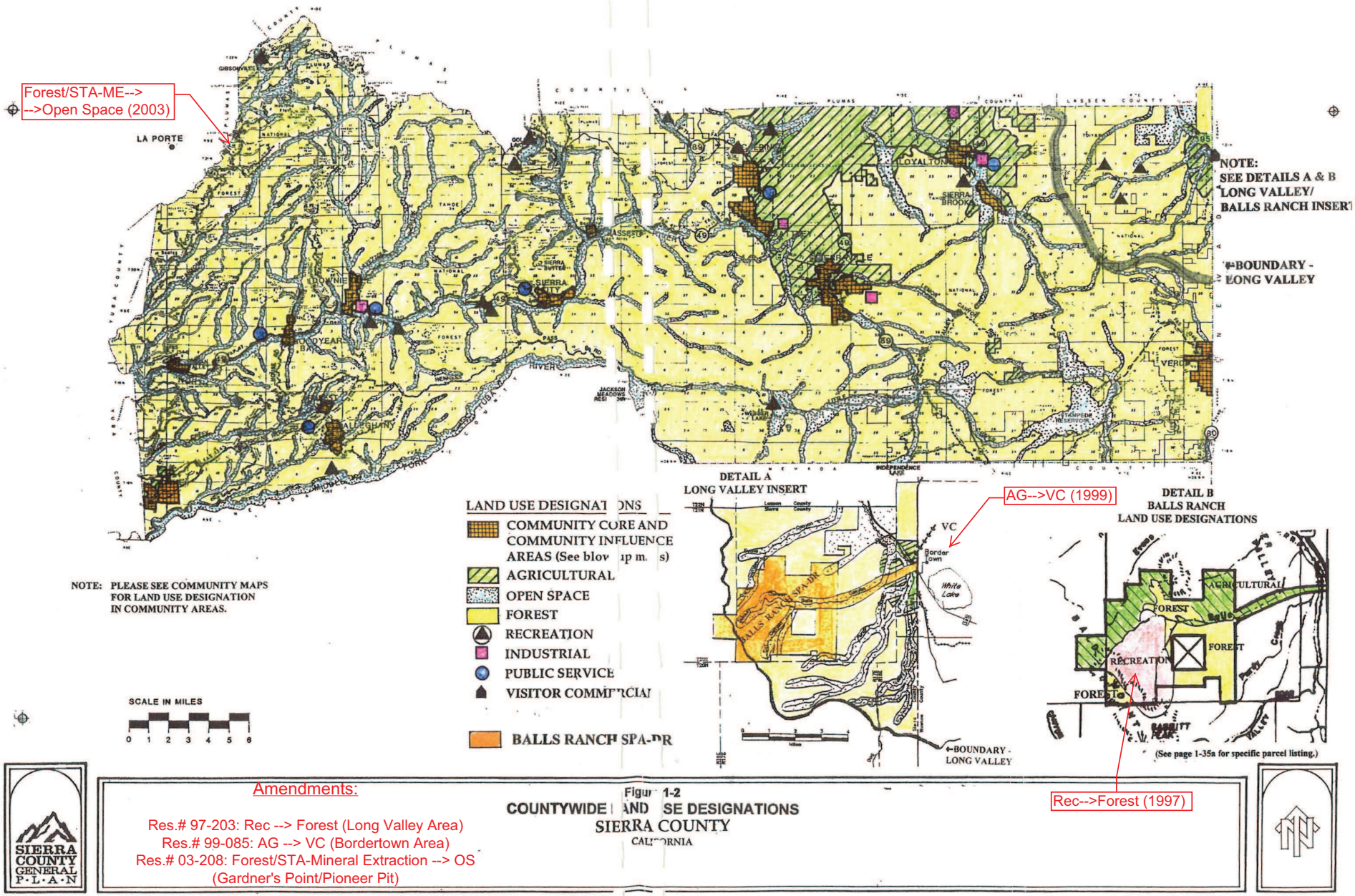
2.0 Emissions Summary

2.1 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
Single Family Housing	395777					259.01	0.01	0.00	259.73
Total						**259.01**	**0.01**	**0.00**	**259.73**

APPENDIX C - SIERRA CO GP LAND USE MAP



SIERRA COUNTY GENERAL PLAN

Amendments:

Res.# 97-203: Rec --> Forest (Long Valley Area)
Res.# 99-085: AG --> VC (Bordertown Area)
Res.# 03-208: Forest/STA-Mineral Extraction --> OS (Gardner's Point/Pioneer Pit)

Figure 1-2
COUNTYWIDE LAND USE DESIGNATIONS
SIERRA COUNTY
CALIFORNIA